

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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Report taken by:
RICK ALLISON

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECOM is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>MAGPIE OPERATING INC</u>	Operator No: <u>52530</u>	Phone Numbers Phone: <u>(719) 429-1434</u> Mobile: <u>()</u>
Address: <u>2707 SOUTH COUNTY RD 11</u>		
City: <u>LOVELAND</u>	State: <u>CO</u>	Zip: <u>80537</u>
Contact Person: <u>Jody Kost</u>	Email: <u>magpieoil2@yahoo.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33419 Initial Form 27 Document #: 403566521

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>069-06114</u>	County Name: <u>LARIMER</u>
Facility Name: <u>HALE 3</u>	Latitude: <u>40.351373</u>	Longitude: <u>-105.047126</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>31</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>307132</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>HALE-65N68W 31SWSE</u>	Latitude: <u>40.351403</u>	Longitude: <u>-105.047550</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>31</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488488</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>Hale 3 Flowline Separator</u>	Latitude: <u>40.351172</u>	Longitude: <u>-105.041398</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>31</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488489</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>Hale 3 Wellhead</u>	Latitude: <u>40.351373</u>	Longitude: <u>-105.047126</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>31</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Cropland

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Pond ~300' northwest of wellhead and residence ~150' west of wellhead. The site is in HPH within Bald Eagle Active Nest Site Half Mile.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- E&P Waste Other E&P Waste Non-E&P Waste
- Produced Water Workover Fluids
- Oil Tank Bottoms
- Condensate Pigging Waste
- Drilling Fluids Rig Wash
- Drill Cuttings Spent Filters
- Pit Bottoms
- Other (as described by EPA)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	TBD	Laboratory analysis if encountered
UNDETERMINED	SOILS	TBD	Soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Initial site assessment was conducted on 1/26/2024; 4 samples were collected at wellhead on 1/26/2024 and 1 sample at the flowline endpoint on 2/1/2024. FL-22-07 @ 4' indicated TPH (770 mg/kg) and SAR (10.1) exceedances and EX-SS-02 @ 4' exceeded local clean-up levels for Arsenic (7.77 mg/kg).

Excavation was conducted on 8/28/2024; excavation samples were collected at the wellhead and flowline endpoint on 9/6/2024. Wellhead confirmation sample, EX-SS-E06 @ 5' indicated TPH exceeded (1049 mg/kg). Additionally, confirmation samples at the Flowline endpoint indicated exceedances; FL-EX-E01 @ 4' (679 mg/kg), FL-EX-S01 @ 4' (622 mg/kg), FL-EX-W01 @ 4' (4587 mg/kg) and SAR (21.5), and FL-SS-09 @ 5' (7399 mg/kg) ad SAR (17.7).

Excavation was conducted at the flowline endpoint on 10/2/2024 on the floor and west wall; confirmation samples were collected on 10/2/2024. These samples indicated exceedances for SAR only; F-EX-W02 @ 4' SAR (11.1) and FL-SS-10 @ 6' SAR (10.8).

Excavation was conducted on 11/4/2024 at the wellhead and flowline endpoint; confirmation samples were collected in 11/18/2024. Samples at the wellhead and flowline endpoint indicated that TPH were compliant with Table 915-1. SAR exceedances were indicated at the Flowline endpoint rootzone at 3.5' bgs and wellhead at 7' and 8' bgs. Additionally, confirmation samples and rootzone samples at the wellhead and separator show that there are Boron and pH exceedances; background samples indicate that the local level for pH is 8.77 and Boron is 11.4.

Additional delineation of SAR impacts at the wellhead and flowline endpoint will be conducted.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

- Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Additional samples will be collected at the wellhead to delineate the SAR impacts. Magpie requests a reduced analysis for SAR only.

Proposed Groundwater Sampling

- Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

If groundwater is encountered during facility decommissioning activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene, using standard methods appropriate for detecting the target analytes in ECMC Table 915-1.

Proposed Surface Water Sampling

- Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

- Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 40

Number of soil samples exceeding 915-1 16

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 40

NA / ND

-- Highest concentration of TPH (mg/kg) 7130

-- Highest concentration of SAR 21.5

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

Highest concentration of Benzene (µg/l)

Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

Highest concentration of Xylene (µg/l)

Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

 Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

8 BG samples at 4', 5', and 7' bgs were collected. Arsenic Local Clean-Up Level is 1.25 * BG avg (6.33 mg/kg) = 7.58 mg/kg. Additionally, background samples indicate that the local level for pH is 8.77 and Boron is 11.4

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 102

Volume of liquid waste (barrels) 0

Is further site investigation required?

Additional samples will be collected at the wellhead to delineate the SAR impacts. Magpie requests a reduced analysis suite for SAR only.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Facility has been decommissioned. Impacted soils have been excavated and properly disposed of at Pawnee Waste.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Impacted soils have been excavated and properly disposed of.

Soil Remediation Summary

In Situ

_____ Bioremediation (or enhanced bioremediation)
 _____ Chemical oxidation
 _____ Air sparge / Soil vapor extraction
 Yes _____ Natural Attenuation
 _____ Other _____

Ex Situ

Yes _____ Excavate and offsite disposal
 _____ If Yes: Estimated Volume (Cubic Yards) _____ 102
 _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
 No _____ Excavate and onsite remediation
 _____ Land Treatment
 _____ Bioremediation (or enhanced bioremediation)
 _____ Chemical oxidation
 _____ Other _____

Groundwater Remediation Summary

_____ Bioremediation (or enhanced bioremediation)
 _____ Chemical oxidation
 _____ Air sparge / Soil vapor extraction
 _____ Natural Attenuation
 _____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other _____

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).
If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Maggie Operating, Inc. has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 2500 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards _____ 102

E&P waste (solid) description Contaminated dirt

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Pawnee Waste

Volume of E&P Waste (liquid) in barrels _____ 0

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules per surface owner direction.

Is the described reclamation complete? No

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim

Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 08/01/2025

Proposed date of completion of Reclamation. 08/01/2027

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 10/23/2024

Actual Spill or Release date, or date of discovery. 02/01/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/01/2023

Proposed site investigation commencement. 01/26/2024

Proposed completion of site investigation. 05/01/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/28/2024

Proposed date of completion of Remediation. 11/04/2024

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

This Form 27S is being submitted to replace Denied Form 27S (Document #40448246), to correct the Site Investigation Attachment.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Amber Barnett

Title: Compliance Specialist

Submit Date: 04/04/2025

Email: abarnett@ardorenvionemental.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: RICK ALLISON

Date: 08/22/2025

Remediation Project Number: 33419

COA Type**Description**

0 COA	
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ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num**Name**

404078886	FORM 27-SUPPLEMENTAL-SUBMITTED
404079002	ANALYTICAL RESULTS
404079005	ANALYTICAL RESULTS
404153388	DISPOSAL MANIFESTS
404153592	ANALYTICAL DATA SUMMARY TABLE(S)
404153598	PHOTO DOCUMENTATION
404153643	SOIL SAMPLE LOCATION MAP

Total Attach: 7 Files

General Comments**User Group****Comment****Comment Date**

Environmental	ECMC agrees to analyze for SAR only.	08/22/2025
Environmental	Operator returned with corrected figures	08/22/2025
Environmental	<p>returned to draft: Please present a figure that shows the November samples relative to the previous samples that did not comply with Table 915-1. Please show the sample locations relative to the final excavation boundary.</p> <p>Please also clarify the November sample naming. The soil samples with a "WH" in the name plot at the separator and the samples with "FL" in the name plot near the well. That may be the case but it is not intuitive and does not really follow the previous sample naming convention.</p>	04/01/2025

Total: 3 comment(s)