

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Jason Kosola

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 ECMC 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>GUNNISON ENERGY LLC</u>	Operator No: <u>10515</u>	Phone Numbers
Address: <u>999 18TH STREET SUITE 1755N</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Tyson Johnston</u>	Email: <u>tyson.johnston@oxbow.com</u>	Phone: <u>(303) 296-8807</u>
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24644 Initial Form 27 Document #: 403124166

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: Q1 2025 - Status Update - Administratively Close Open Pit Facility IDs (100431 and 115194).

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>100431</u>	API #: _____	County Name: <u>GUNNISON</u>
Facility Name: <u>RIVIERA FED 11-90-7</u>	Latitude: <u>39.119847</u>	Longitude: <u>-107.482224</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>7</u>	Twp: <u>11S</u>	Range: <u>90W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>PIT</u>	Facility ID: <u>115194</u>	API #: _____	County Name: <u>GUNNISON</u>
Facility Name: <u>FEDERAL 7-11-90</u>	Latitude: <u>39.119847</u>	Longitude: <u>-107.482224</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>7</u>	Twp: <u>11S</u>	Range: <u>90W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Rangeland-
National Forest

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? Yes

Other Potential Receptors within 1/4 mile

Little Henderson Creek of the North Fork draw is approximately 220 feet from location.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input checked="" type="checkbox"/> Other (as described by EPA) <u>Historic Blowdown Open Pit Facility IDs (100431 and 115194)</u> | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	~80x80	Site Investigation/Laboratory Analytical
Yes	SOILS	65x65x20	Site Investigation/Laboratory Analytical

INITIAL ACTION SUMMARY

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

Please refer to the State of Colorado Energy and Carbon Management Commission (ECMC) documents associated with facility IDs 100431 and 115194 and Remediation Project Number (RPN) 24644 for information on activities completed prior to the first quarter (Q1) of 2025.

On March 12, 2025, Gunnison performed quarterly groundwater monitoring activities at the Site. These activities included fluid level gauging of all three monitoring wells, and purging of monitoring wells MW-01, MW-02, and MW-03. Depth to groundwater ranged from 18.00' in MW-02 and 19.91' in MW-01. All groundwater measurements were collected from the top of casing (TOC) of the well. A groundwater sample was not collected from MW-03 as this location had insufficient water to collect a sample. Groundwater samples were submitted to Pace Analytical for laboratory analysis for a previously approved reduced suite [Document Number (DN) 403879334] of benzene, toluene, ethylbenzene, and xylenes (BTEX), 1,2,4 - trimethylbenzene, 1,3,5 - trimethylbenzene, and naphthalene.

Please see the attached report of work completed (ROWC) summarizing the quarterly groundwater sampling activities completed during Q1 of 2025.

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):

Gunnison Energy LLC (GE) is in the process of determining a remediation approach to address the soil impacts. Once a remediation plan has been confirmed with the United States Forest Service (USFS) and GE, the plan will then be presented to the ECMC. Vertical and lateral delineation of the soil impacts associated with the historic blowdown pit has been confirmed. Based on the latest subsurface investigation completed in 2023, there are approximately 2,143 cubic yards of impacted soil to be remediated at the Site (DN 403527386). The approximate area of impacted soil is shown on Figures 2 and 3 of the document attached to ECMC DN 4033879334.

All future soil samples will be analyzed for a reduced suite of arsenic, barium, BTEX, TPH, 1,2,4-TMB, 1,3,5-TMB, 1-methylnaphthalene, 2-methylnaphthalene, and naphthalene (DN 403879334).

Proposed Groundwater Sampling

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

GE will continue to gauge and sample all groundwater monitoring wells on a quarterly basis as Site access allows.

Groundwater samples will be analyzed for a reduced suite of BTEX, 1,2,4-TMB, 1,3,5-TMB, and naphthalene (DN DN 403879334).

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):

Impacts have been delineated at the Site.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 3000

NA / ND

 Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet)

Groundwater

Number of groundwater samples collected 3

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 13

Number of groundwater monitoring wells installed 3

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

ND 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?

Please see ECMC DNs 403193909, 403527386, and 403879334 for previously collected site-specific background soil sample details and results per ECMC Rule 915.e.(2).D.

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

Volume of solid waste (cubic yards)

Volume of liquid waste (barrels)

Is further site investigation required?

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.

Impacts are fully delineated. See GE's remediation plan in the "Remediation Summary" section of this document and an in depth plan in the attached ROWC.

REMEDICATION 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.

Gunnison Energy LLC (GE) is in the process of determining a remediation approach to address the soil impacts. Once a remediation plan has been confirmed with the United States Forest Service (USFS) and GE, the plan will then be presented to the ECMC. Vertical and lateral delineation of the soil impacts associated with the historic blowdown pit has been confirmed. Based on the latest subsurface investigation completed in 2023, there are approximately 2,143 cubic yards of impacted soil to be remediated at the Site (DN 403527386). The approximate area of impacted soil is shown on Figures 2 and 3 of the document attached to ECMC DN 4033879334.

Soil Remediation Summary

In Situ

Ex Situ

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

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ 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.

GE plans to install a minimum of one additional groundwater monitoring well within the footprint of the historic pit location once the impacted soils have been removed and remediated. This will confirm the removal of the source impacts. GE will continue to gauge and sample the three existing groundwater monitoring wells outside the pit footprint on a quarterly basis as Site access allows.

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 location has been through final reclamation.

Is the described reclamation complete? _____

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. _____

Proposed date of completion of Reclamation. _____

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/22/2022

Proposed site investigation commencement. 07/10/2023

Proposed completion of site investigation. 07/02/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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

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

Signed: Parker Coit, PG

Title: Geologist

Submit Date: 07/08/2025

Email: parker.coit@wsp.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: Jason Kosola

Date: 08/26/2025

Remediation Project Number: 24644

COA Type**Description**

	ECMC approves reduced analyte request as described.
1 COA	

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**

404101018	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404270617	MONITORING REPORT
404270619	ANALYTICAL RESULTS
404329940	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)