

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
KRIS NEIDEL

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>SCOUT ENERGY MANAGEMENT LLC</u>	Operator No: <u>10779</u>	Phone Numbers
Address: <u>13800 MONTFORT DRIVE SUITE 100</u>		Phone: <u>(970) 551-8320</u>
City: <u>DALLAS</u> State: <u>TX</u> Zip: <u>75240</u>		Mobile: <u>(970) 902-0518</u>
Contact Person: <u>Cody Christian</u>	Email: <u>cody.christian@scoutep.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18394 Initial Form 27 Document #: 402641267

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

No Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>454161</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>Lateral Carney 21-35 1</u>	Latitude: <u>40.103200</u>	Longitude: <u>-108.815700</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>35</u>	Twp: <u>2N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Non Crop Land
 Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No
 Is groundwater less than 20 feet below ground surface? No

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" 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 type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	713ft. x 1ft. x 0.5 ft	Field determined with tape measure

INITIAL ACTION SUMMARY

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

The night pumpers found a leak on the Carney 21X-35 lateral at 10:15 PM. Plant operators called additional waggors and water trucks out and the waggors and night pumpers isolated the entire Town Trunk injection line. After checking the leak they were able to isolate it further at a lateral valve and bring the rest of the Town Trunk injection line back in service. Rocking R trucking recovered 50 Bbls of injection water. Approximately 8 Bbls of injection water was lost, and water washing was started the following morning. A soil sample location map and preliminary analytical results are included as an attachment.

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):

Preliminary soil samples were collected on May 16, 2018 from the spill path. A total of four (4) grab samples analyzed for Table 910-1 parameters were collected at a depths from 0 to 6 inches below ground surface (ft-bgs). Results show elevated DRO, SAR and EC levels within the impacted area. Subsequent soil samples analyzed for SAR at SS1 and SS3 sample locations, EC at SS1-SS4 sample locations and DRO at SS3 sample location will be collected during the summer of 2021 to monitor natural attenuation. The resample at SS3 is intended to give a current representation of DRO levels in this area. If the DRO level at the SS3 location continue to remain above the Table 910-1 standard then a subsequent Form 27 outlining remediation approach will be submitted. SAR and EC impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized.

Proposed Groundwater Sampling

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

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 8
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 713

NA / ND

-- Highest concentration of TPH (mg/kg) 9310
-- Highest concentration of SAR 5.57
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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?

A historical background sample associated with a nearby past release was selected as part of this site investigation.

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?

Confirmation sample will be collected following the removal of impacted soils at SS1.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

TPH impacted soils will be removed from the area around sample location CT2135-SS1, an approximate area of 50 sq. ft. to a depth of 6 inches, using hand tools and equipment. TPH impacted soil will be taken to the Scout Rangely Landfarm.

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.

Organic impacts will be treated ex-situ by excavation. Any inorganic impacts will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized.

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) _____ 1
- 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.

REMEDIATION 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 REM Progress Rpt. _____

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.

The policies described below afford industry standard terms and conditions for said policy types, noting that Scout's pollution coverage is broadened pollution legal liability which does not dictate cover based on gradual pollution or sudden or accidental pollution losses. The coverage is intended to respond if a loss occurs during the policy period as respects to a particular property (owned, leased, operated). Note that all layers of excess coverage shown act in excess of the general liability policy, and note that only the Lead \$10M Umbrella Policy is afforded in excess of pollution coverage.

Operator anticipates the remaining cost for this project to be: \$ 2000 _____

WASTE DISPOSAL INFORMATION

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

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

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

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDIATION COMPLETION REPORT

REMEDIATION 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.

If reclamation is necessary, it will be completed following 1000 Series regulations.

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. 02/02/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/16/2018

Proposed site investigation commencement. _____

Proposed completion of site investigation. 05/16/2018

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

Preliminary samples were collected on May 16, 2018 and summarized in the Initial Form 27 (Doc #402641267).

Subsequent soil samples were collected on April 19, 2021. All four (4) sample locations were sampled and analyzed for a modified list of parameters with an exceedance to Table 915-1 standards of EC at SS1 above local background levels.

The spill was allowed to naturally attenuate and all four (4) locations were sampled on November 1, 2024 for past overages to Table 915-1 as well as analytical parameter gaps between Table 910-1 and Table 915-1. Results indicate the only current exceedance to Table 915-1 standards above local background levels is TPH at SS1. Please see the attached documents for sample locations, depths and analytical results.

A small scale clean up of TPH impacted soils is scheduled for 2025 and a confirmation sample will be collected. Scout requests approval of a reduced analyte list on all future samples consisting of TPH at SS1 only.

A continued annual reporting schedule is also requested for this project moving forward.

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

Signed: Cody Christian

Title: HSE Coordinator I

Submit Date: 03/13/2025

Email: cody.christian@scoutep.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: KRIS NEIDEL

Date: 08/29/2025

Remediation Project Number: 18394

COA Type**Description**

	Annual reporting and sampling is approved.
	Lab data must comply with ECMC's Data Integrity Practices document to be accepted. See Policies and Notices to operators, current doc is dated 4/8/2025.
	Delineation is required in the following areas: SS1,SS3 for TPH.
	It appears that Form 19 doc #401565935 states the point of release is 12 feet BGS. It is stated, "...thus the actual depth to groundwater is likely to be deeper than 12 feet at the release location. " Delineation at an appropriate depth is required at the origin, for full Table 915-1.
4 COAs	

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**

404127560	FORM 27-SUPPLEMENTAL-SUBMITTED
404127563	SOIL SAMPLE LOCATION MAP
404127565	ANALYTICAL RESULTS
404127566	ANALYTICAL RESULTS
404127571	ANALYTICAL RESULTS

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)