

State of Colorado
Energy & Carbon Management Commission

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404139056
Receive Date:
04/08/2025
Report taken by:
Krystal Heibel

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>OWN RESOURCES OPERATING LLC</u>	Operator No: <u>10699</u>	Phone Numbers
Address: <u>305 S RIDGE STREET #6279</u>		
City: <u>BRECKENRIDGE</u>	State: <u>CO</u>	Zip: <u>80424</u>
Contact Person: <u>Niels Phaf</u>	Email: <u>niels.phaf@ownresources.com</u>	Phone: <u>(970) 332-3585</u>
		Mobile: <u>(713) 628-7339</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36074 Initial Form 27 Document #: 403835058

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>125-06764</u>	County Name: <u>YUMA</u>
Facility Name: <u>DEVLIN 32-4</u>	Latitude: <u>39.654393</u>	Longitude: <u>-102.183638</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>4</u>	Twp: <u>5S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>303313</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>DEVLIN-65S43W 4SWNE</u>	Latitude: <u>39.654393</u>	Longitude: <u>-102.183638</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>4</u>	Twp: <u>5S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications ML

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

Other Potential Receptors within 1/4 mile

Livestock well approximately 2580' south, designated groundwater management area, designated basin, intermittent/seasonal stream approximately 1710' south, no high priority habitat

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	Medium	Soil Analysis

INITIAL ACTION SUMMARY

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

No initial action or emergency response measures required and/or taken, this Form 27 is for a planned P& A. Scope: wellhead location 303313, meter shed, and a water tank. The wellbore will be cut and capped 4'-6' below grade. On location flowlines will be removed, gathering line will be cut and capped on location at 4'-6' below grade and remain active to other producing wells. Produced water tank will be excavated and removed.

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):

Well was plugged in December 2024 - 6 soil samples were collected. One from the wellhead, one from the drip bottle, one from the gas disconnect, one from the tank bottom, one from the tank inlet and a background sample 60 feet from the wellhead. Field screening was done along four walls and floor quadrant of wellhead excavation area and tank, separator and meter shed. Soil sample were taken after field screening and showed no positive readings and no visible staining that would result in additional sampling. Samples were analyzed to full table 915-1.

Proposed Groundwater Sampling

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

No groundwater encountered during any excavations.

Proposed Surface Water Sampling

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

No surface water observed

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 6

Number of soil samples exceeding 915-1 6

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

NA / ND

ND Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 No

Approximate areal extent (square feet) 2800

Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

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

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

One background sample collected, met Table 915-1 limits except for pH level at 8.51 and arsenic at 3.27 mg/kg.

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? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The lab analysis show all samples met Table 915-1 limits except:
1. pH levels were higher on all location including background. Wellhead 9.25, Separator 8.84, Gas disconnect 8.47, Tank bottom 9.88, Tank inlet 9.42, and Background 8.51.
2. Boron show elevated level only at the tank bottom at 4.52.
3. The arsenic levels are also higher everywhere including background - Wellhead 2.97, Separator 2.17, Gas disconnect 2.97, Tank bottom 4.16, Tank inlet 3.42 and Background 3.27

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.

After plugging and abandoning (P&A), all equipment was removed, the area has been leveled / recontoured. The are will be decompacted, seeded, will crimp straw to ensure that natural moisture can penetrate the ground.
1. For pH we propose no further action, since location pH is in similar to the background sample collected from nearby, non-impacted native soils showing that elevated arsenic levels are naturally occurring in the native soils in the area.
2. On arsenic we propose no further action, since location arsenic is similar to the background sample collected from nearby, non-impacted native soils showing that elevated arsenic levels are naturally occurring in the native soils in the area.
3. On Boron at the tank bottom area we will treat through natural attenuation by ensuring the area is highly decompacted so that natural moisture can easily penetrate the ground.

One Boron confirmation soil sample will be taken in Q1/Q2 2026 from the tank area.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
Yes _____ Other _____
Decompaction of soil so
moisture can enter easily

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.

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 _____

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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs.

Operator anticipates the remaining cost for this project to be: \$ 1500 _____

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.

After the well was plugged in December 2024, all surface equipment was removed. The site was recontoured and will be decompacted, seeded with an approved seed mix specific to the area and straw will be crimped to promote stabilization. The site will be actively monitored, with measures implemented to prevent the spread of noxious weeds and to control erosion, ensuring successful reclamation. Estimated 80% vegetation growth by summer 2027.

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? No

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

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

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 11/22/2024

Proposed date of completion of Reclamation. 06/30/2027

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. 06/24/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/22/2024

Proposed site investigation commencement. 12/10/2024

Proposed completion of site investigation. 02/19/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/11/2024

Proposed date of completion of Remediation. 06/30/2027

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:

Updated based on received soil sample results

OPERATOR COMMENT

The COA are address as follows:

- 1) On location flowline was removed in December 2024. Gas line will remain active.
- 2) Soil samples were collected and analyzed to table 915-1, analytical attached. Flowlines were pressure tested and field screenings were conducted in December 2024.
- 3) One confirming soil sample for Boron will be collected mid 2026 and analyzed to Table 915-1
- 4) No ground water was encounter at the time of the P&A work.

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

Signed: Azucena Torres

Title: Reclamation & Remediation

Submit Date: 04/08/2025

Email: azucena.torres@ownresources.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: Krystal Heibel

Date: 09/09/2025

Remediation Project Number: 36074

COA Type**Description**

1 COA	Arsenic, pH, and boron concentrations in confirmation soil samples exceed the Table 915-1 Residential Soil Screening Level Concentrations and the arsenic concentration is greater than 1.25 times the arsenic concentration in the background sample. Operator will provide additional data to characterize these concentrations at the site and to determine its source in the next quarterly report or provide an alternative remediation plan for these exceedances.
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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**

404139056	FORM 27-SUPPLEMENTAL-SUBMITTED
404141601	ANALYTICAL RESULTS
404148144	SOIL SAMPLE LOCATION MAP
404148164	ANALYTICAL DATA SUMMARY TABLE(S)
404156496	REMEDATION PROGRESS REPORT
404156652	PHOTO DOCUMENTATION

Total Attach: 6 Files

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

Environmental	<p>"The COA are address as follows:</p> <ol style="list-style-type: none"> 1) On location flowline was removed in December 2024. Gas line will remain active. 2) Soil samples were collected and analyzed to table 915-1, analytical attached. Flowlines were pressure tested and field screenings were conducted in December 2024. 3) One confirming soil sample for Boron will be collected mid 2026 and analyzed to Table 915-1 4) No ground water was encounter at the time of the P&A work." 	09/09/2025
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Total: 1 comment(s)