

State of Colorado
Energy & Carbon Management Commission

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



Document Number:
404148356
Receive Date:
04/01/2025
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 #: 19116 Initial Form 27 Document #: 402641282

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>477880</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>Emerald 39</u>	Latitude: <u>40.101000</u>	Longitude: <u>-108.893000</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>31</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? Yes
 Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

The nearest "surface water" is an unnamed dry ephemeral drainage approximately 328 feet north west of the spill origin.

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
Yes	SOILS	332ft. x 20ft. 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.

Operator was making normal check in his area and discovered leak coming from the Emerald 39 produced water Lateral. He shut in lateral and equipment and made all proper notifications. Standing produced water was picked up with a vac-truck Area was water washed with 320 bbls of clean water from the Main Water Plant. Depth of release was approximately 6 ft bgs. 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 September 16, 2020 from below the repaired section of flowline and on October 5, 2020 from the spill path. A total of five (5) grab samples analyzed for Table 910-1 parameters were collected at a depths from 0 to 6 feet below ground surface (ft-bgs). Results show elevated DRO, SAR and EC levels within the impacted area. Subsequent soil samples analyzed for SAR at SS2 and SS3 sample locations and EC at SS1-SS3 sample locations will be collected during 2021 to monitor natural attenuation. A confirmation soil sample analyzed for DRO will be collected once impacted soil has been removed. 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 5
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 6640

NA / ND

-- Highest concentration of TPH (mg/kg) 198
-- Highest concentration of SAR 30.1
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?

One background soil sample was collected as part of this investigation. A historical background sample associated with a nearby past release was also selected. This sample is located approximately 435 feet north of the spill origin. Results may be found in the attached analytical results.

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.

The area around the SS2 sample location will be visually inspected, field screened using a PID during 2021. Identified impacted areas will be flagged and scheduled for excavation to remove hydrocarbon impacted soil. All soil will be transported to the Rangely landfarm for disposal.

SAR and EC impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized. Subsequent soil samples analyzed for SAR at SS2 and SS3 sample locations and EC at SS1-SS3 sample locations will be collected during 2021 to monitor natural attenuation.

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.

The area around the SS2 sample location will be visually inspected, field screened using a PID during 2021. Identified impacted areas will be flagged and scheduled for excavation to remove hydrocarbon impacted soil. All soil will be transported to the Rangely landfarm for disposal.

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) _____ 20
Name of Licensed Disposal Facility or ECMC Facility ID # _____
Yes _____ Excavate and onsite remediation
Yes _____ Land Treatment
No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ 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. 09/04/2020

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/05/2020

Proposed site investigation commencement. _____

Proposed completion of site investigation. 10/05/2020

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/01/2021

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

This form serves as an update to sampling activities for REM #19116 since the submittal of the Initial Form 27 (Doc #402641282).

A subsequent soil sample was collected from EM39-SS2 on May 10, 2022 following the removal of TPH impacted soils and analyzed for TPH-DRO, SAR and EC. Results indicated no continuing TPH exceedances at this sample location.

The spill was again sampled at all three (3) original surface sample locations on December 10, 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 exceedances to Table 915-1 standards above local background levels at these locations are SAR (SS2) and HSB (SS2).

On December 19, 2024 a sample was collected from beneath the failed section of pipe (EM39-POR) at a depth of five (5) feet and analyzed for Table 915-1 parameters. Results indicated no exceedances to Table 915-1 standards above local background levels at this depth. Please see the attached documents for sample locations, depths and analytical results.

Natural attenuation will continue to be monitored at this remediation. Scout requests approval of a reduced analyte list on all future samples consisting of SAR and HSB at SS2 only. An annual reporting schedule is 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: 04/01/2025

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: 09/12/2025

Remediation Project Number: 19116

COA Type**Description**

	Semi-annual reporting is approved with annual sampling.
	Request for a modified list of contaminants of concern is Not approved at this time.
	Additional Vertical and lateral delineation is required in the spill path along SS2, for; TPH, BTEX, Agronomics, ChromVI.
3 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**

404148356	FORM 27-SUPPLEMENTAL-SUBMITTED
404148460	SOIL SAMPLE LOCATION MAP
404148469	ANALYTICAL RESULTS
404148471	ANALYTICAL RESULTS
404148472	ANALYTICAL RESULTS
404148479	ANALYTICAL RESULTS
404148507	ANALYTICAL RESULTS

Total Attach: 7 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)