

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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404133647  
Receive Date:  
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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>	<b>Phone Numbers</b>
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 #: 37433 Initial Form 27 Document #: 403954283

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>125-08346</u>	County Name: <u>YUMA</u>
Facility Name: <u>MOELLENBERG 23-31443</u>	Latitude: <u>39.665108</u>	Longitude: <u>-102.226239</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>31</u>	Twp: <u>4S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>304387</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>MOELLENBERG-64S43W 31NESW</u>	Latitude: <u>39.665108</u>	Longitude: <u>-102.226239</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>31</u>	Twp: <u>4S</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 irrigated  
crop \_\_\_\_\_

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 925' North, livestock well approximately 2530' South-South-east, water depth >150', designated groundwater management area, designated basin, seasonal stream approximately 1060' East, no high priority habitat; no wetlands nearby; no national wetlands nearby.

# 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 is for a planned P&A and partial flowline abandonment. Scope: Wellhead Location ID# 304387, pumping unit, meter shed, produced water tank, abandonment of gathering line from wellhead to gas disconnect location 2500' southeast of wellhead and cut and capped on December 2024.

## 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 ):

The well was plugged December 2024. A total of six soil samples were collected: one at the wellhead, one at the separator, one at the gathering line disconnect, one from the tank, and one from the tank inlet and one background approximately 60 feet from the wellhead. These samples were taken after field screening of the three excavation areas and removal of the wellhead, meter shed, tank, and gathering line disconnect / successful pressure test. No indications were identified during screening that warranted further sampling. All soil samples were analyzed in accordance with Table 915-1.

### Proposed Groundwater Sampling

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

Groundwater is not expected in any of the excavations, water depth deeper than 150'

### Proposed Surface Water Sampling

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

No permanent surface water in area

### Additional Investigative Actions

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

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

### NA / ND

Number of soil samples collected 6

-- Highest concentration of TPH (mg/kg) 75

Number of soil samples exceeding 915-1 6

-- Highest concentration of SAR 5.24

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

BTEX > 915-1 No

Approximate areal extent (square feet) 2498

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 was taken and met levels in Table 915-1 requirements except for Arsenic which has an level of 2.82.

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.

Soil sample results show exceeded limits:  
1) EC at Tank location (5.24)  
2) SAR at the Wellhead (6.14)  
3) pH at the Wellhead (9.93), Tank Inlet (8.88), Gas Disconnect (8.82), and Separator (8.94).  
4) Arsenic at Wellhead (2.85), Tank (2.63), Tank Inlet (2.93), Gas Disconnect (2.68) Separator( 2.91) and Background (2.82)

**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.

The area will be de-compacted, seeded, and straw will be crimped to ensure that natural moisture can penetrate the ground. We will focus our efforts on improving soil structure, natural attenuation, and applying soil amendments to address elevated contaminant levels. The selected remedial methods are supported by recommendations from a local agronomist and are appropriate for the site's soils.  
1. EC- slightly elevated at the tank area, will be treated with application of Reclaim (or equivalent soil amendment) and Gypsum.  
2. SAR-to mitigate and reduce levels at the wellhead an application of Gypsum will be used.  
3. pH will be treated by adding sulfur to the the affected areas.  
4. On arsenic we propose no further action (NFA), 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.  
Confirmation soil sample of soil suitability will be taken in Q1/Q2 2026.

**Soil Remediation Summary**

In Situ

Ex Situ

Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
Yes Natural Attenuation  
Yes Other De-compaction, Soil Treatments  
(Soft Soil, Reclaim, Sulfur and  
Gypsum) as needed \_\_\_\_\_

\_\_\_\_\_ 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.



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 well was plugged in December 2024, and all equipment was removed and location was recontoured as documented in the attached photobook. In Spring 2025, the site de-compacted using mechanical ripping. A conservation-approved, site-specific seed mix will be broadcast or drilled and covered with certified weed-free straw. The site will be monitored for noxious weeds, with control measures implemented as needed. The goal is to achieve 80% regrowth by Summer 2027, with monitoring continuing until vegetation establishment meets regulatory requirements.

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. 12/12/2024

Proposed date of completion of Reclamation. 07/30/2027

## 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. 10/10/2024

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/12/2024

Proposed site investigation commencement. 12/12/2024

Proposed completion of site investigation. 02/19/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/12/2024

Proposed date of completion of Remediation. 06/01/2026

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:

Soil samples became available

**OPERATOR COMMENT**

COA have been addressed as follows:

- 1) The Cut & Cap was completed December 13, 2024, Operator Summary and Summit Scientific Analytical attached.
- 2) and 3) Gathering line was pressure tested and passed; Line was field screened, no dead spots were apparent along the line; No historical leaks on this line; Samples taken at the highest usage areas - disconnect and well head; because of this and to further disturb the environment we took no further samples.
- 4) Based on water well reports the groundwater depth (>150 feet), no direct impact to groundwater is anticipated
- 5) No groundwater was encountered during the P&A work.
- 6) Updated remediation plan has been provided
- 7) Revised soils sample and field screening map and pictures attached
- 8) Samples were taken under the tank and at the tank inlet. Also attached are photographs showing the bottom of the tank footprint after removal.
- 9) Background sample show on map approx. 60' away from the wellhead.

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

Signed: Azucena TorresTitle: Reclamation & RemediationSubmit Date: 04/22/2025Email: 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 HeibelDate: 09/23/2025Remediation Project Number: 37433**COA Type****Description**

	<p>Operator shall take a confirmation soil sample at the bend on the flowline and analyze it for full Table 915-1 analytes.</p> <p>Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.</p>
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**

404133647	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404138062	ANALYTICAL RESULTS
404157096	AERIAL IMAGE
404157097	SOIL SAMPLE LOCATION MAP
404157098	SOIL SAMPLE LOCATION MAP
404157633	PHOTO DOCUMENTATION
404159526	ANALYTICAL DATA SUMMARY TABLE(S)
404172502	REMEDATION PROGRESS REPORT
404364727	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

Environmental	Based on the Operator's assessment of background conditions at the subject location, arsenic results for confirmation soil samples appear to be representative of background as opposed to E&P activities. Therefore, the Operator's demonstration of background will be accepted as an alternative to the default standard in ECMC's Table 915-1.	09/23/2025
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Environmental	"1. pH- to reduce pH soil will be treated with sulfur to reduce to acceptable levels 2. Boron will be treated with Reclaim as a soil amendment. 3. Arsenic-No Further Action (NFA), levels are inline with background we will not take further action. We will take confirmation samples in Qrt-3 2026 to verify pH and Boron at the wellhead."	09/23/2025
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Total: 2 comment(s)