

State of Colorado
Energy & Carbon Management Commission

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404391594
Receive Date:
10/14/2025
Report taken by:
Chris Sanchez

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 ECOM 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>P O & G OPERATING LLC</u>	Operator No: <u>10634</u>	Phone Numbers
Address: <u>5847 SAN FELIPE SUITE 3200</u>		Phone: <u>(346) 220-8355</u>
City: <u>HOUSTON</u> State: <u>TX</u> Zip: <u>77057</u>		Mobile: <u>(720) 641-8661</u>
Contact Person: <u>Rick Eggleston</u>	Email: <u>rick_eggleston@pogresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41759 Initial Form 27 Document #: 404283540

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>LOCATION</u>	Facility ID: <u>321831</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>HARKER RANCH MORROW UNIT (HR-613S43 12NESW)</u>		Latitude: <u>38.935065</u>	Longitude: <u>-102.177749</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NESW</u>	Sec: <u>12</u>	Twp: <u>13S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <input type="checkbox"/> Yes

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>490859</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>HRMU Tank Battery</u>		Latitude: <u>38.935773</u>	Longitude: <u>-102.177614</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NESW</u>	Sec: <u>12</u>	Twp: <u>13S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <input type="checkbox"/> Yes

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Cropland

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

Location is within the Lesser Prairie Chicken Estimated Occupied Range and Lesser Prairie Chicken Connectivity Area HPH.

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 checked="" 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
No	GROUNDWATER	NA	Not encountered
No	SOILS	NA	Lab 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.

During an ECMC inspection they discovered alleged contaminated soil areas inside and outside the tank battery berm. The soil in the alleged areas are in the process of being removed. Once the soil has been removed the affected areas will be sampled. The samples will be sent to a certified lab for Table 915-1 analysis. Once PO&G receives sample results that are below Table 915 -1 concentrations the areas will be backfilled with clean material. All contaminated soil will be stockpiled on plastic and then disposed of at a certified disposal facility

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):

Confirmation samples will be collected after impacted soils have been removed and properly disposed of.

Proposed Groundwater Sampling

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

If groundwater is encountered, a minimum of one grab sample will be collected as soon as practical. Groundwater sample(s) will be analyzed will be analyzed for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chlorides) and organic compounds in water.

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	NA / ND
Number of soil samples collected <u> 4 </u>	<u> </u> Highest concentration of TPH (mg/kg) <u> </u>
Number of soil samples exceeding 915-1 <u> 1 </u>	<u> </u> Highest concentration of SAR <u> </u>

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

BTEX > 915-1 No _____

Approximate areal extent (square feet) _____ 0

Vertical Extent > 915-1 (in feet) _____ 0

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?

Yes multiple background samples were collected. See attached maps

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

Volume of solid waste (cubic yards) _____ 36

Volume of liquid waste (barrels) _____ 0

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.

Impacted soils will be excavated and properly disposed of a certified waste facility.

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.

Impacted soils will be excavated and properly disposed of a certified waste facility.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 36

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

No Excavate and onsite remediation

_____ Other _____

_____ 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 Supplemental Form 27 to document progress of site investigation and remediation

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.

PO&G has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 5000

WASTE DISPOSAL INFORMATION

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

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

NA

Volume of E&P Waste (solid) in cubic yards 36

E&P waste (solid) description Contaminated soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Supplemental Form 27 to document progress of site investigation and remediation

Volume of E&P Waste (liquid) in barrels 0

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? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes

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.

This is an active location. When location is decommissioned, the site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules or per surface owner direction.

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? _____

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. 07/17/2025

Actual Spill or Release date, or date of discovery. 04/10/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/21/2025

Proposed site investigation commencement. 07/21/2025

Proposed completion of site investigation. 07/24/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/21/2025

Proposed date of completion of Remediation. 07/24/2025

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 is a request for final closure on remediation.

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

Signed: Rick Eggleston

Title: EHS&R Project Coordinator

Submit Date: 10/14/2025

Email: rick_eggleston@pogresources.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: Chris Sanchez

Date: 10/16/2025

Remediation Project Number: 41759

COA Type**Description**

	Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. Quarterly updates shall include a current map of the subject location including current excavation limits and/or sample locations, proposed/actual soil boring locations and monitoring well locations. GPS data used to create the map must comply with ECMC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit field notes of all field activities reported during a Quarterly Update along with photo documentation.
	Per Condition of Approval (COA) in Form 19 document no. 404380513: This Form 19 Requesting closure for Spill ID 490859 was submitted 89-days late. The Operator shall provide additional details in a Supplemental Form 27-S filing for Remediation Project # 41759 addressing late reporting to include, reasons for late reporting, and actions implemented to prevent late reporting in the future, additional violations may result in enforcement.
	Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil Operator shall collect confirmation soil samples for Full Table 915-1 Contaminants of Concern
	Operator shall adhere to Protection of Groundwater Soil Screening Levels
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days).
	Operator shall continue Quarterly Reporting until the Site Assessment is completed and the remediation area demonstrates Compliance with Table 915-1 Standards.
	All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
	ECMC removed the final closure request for Remediation Project # 41759. Operator has not provided supporting Data/Analytical Results showing impacts to soils have been remediated. Attached Analytical data shows exceedances to Table 915-1 cleanup concentrations but does not provide supporting data showing impacts were remediated in accordance with Rule 913 and Rule 915.
8 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
404391594	FORM 27-SUPPLEMENTAL-SUBMITTED
404391598	ANALYTICAL DATA SUMMARY TABLE(S)
404391599	LABORATORY ANALYTICAL REPORT
404391600	LABORATORY ANALYTICAL REPORT

404391601	LABORATORY ANALYTICAL REPORT
404391602	SOIL SAMPLE LOCATION MAP
404391604	SITE MAP
404391605	REMEDIATION PROGRESS REPORT
404391606	DISPOSAL MANIFESTS
404391607	DISPOSAL MANIFESTS
404391609	SOIL SAMPLE LOCATION MAP

Total Attach: 11 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)