

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404413208  
Receive Date:  
10/28/2025  
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: POC-I LLC	Operator No: 10386	<b>Phone Numbers</b>
Address: P.O. BOX 51208		Phone: (307) 746-6468
City: CASPER State: WY Zip: 82605		Mobile: (307) 746-6468
Contact Person: Rebecca Podio	Email: rpodio@gmail.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28244 Initial Form 27 Document #: 403272607

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: PIT	Facility ID: 116587	API #: _____	County Name: MOFFAT
Facility Name: ILES GATHERIN FACILITIES	Latitude: 40.307715	Longitude: -107.689715	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT	Facility ID: 116589	API #: _____	County Name: MOFFAT
Facility Name: ILES DOME SUNDANCE TANK BAT 2/PIT	Latitude: 40.307379	Longitude: -107.689185	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT Facility ID: 119213 API #: County Name: MOFFAT  
Facility Name: ILES DOME UNIT Latitude: 40.307410 Longitude: -107.689390  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: CNW Sec: 23 Twp: 4N Range: 92W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Rangeland, Surface Water  
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes  
Is groundwater less than 20 feet below ground surface? Yes

**Other Potential Receptors within 1/4 mile**

The site sits within 1/4 mile of the following the Colorado Parks and Wildlife High Priority Habitat. Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, Elk Winter Concentration Area, Elk Severe Winter Range, Elk Migration Corridor, Aquatic Cutthroat Trout designated Crucial Habitat, Greater Sage Grouse General Habitat Management Area, Columbian Sharp-tailed Grouse Winter Range, Columbian Sharp-tailed Grouse Production Area, Greater Sage Grouse Priority Habitat Management Area, and Aquatic Native Species Conservation Waters



# 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
Yes	SOILS	To be determined	Visual inspection and laboratory analysis
Yes	SURFACE WATER	To be determined	Visual inspection and laboratory 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.

Oil was initially discharged from the pit's discharge outfall (Facility ID 116589). Booms were placed, and areas with a sheen were recovered with a vacuum truck. Representatives of POC have walked the spill pathway to identify areas of impact. No impacted vegetation was observed. Impacted soils and water will be remediated to below-appropriate standards.

## 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 ):

Pre-sampling will occur in both the large pit and the two smaller pits to identify the extent of the contamination. Sampling will also determine when both areas have met the standards required by ECMC and other regulators.

### Proposed Groundwater Sampling

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

Ongoing groundwater monitoring at the location is to be completed under Remediation Project #8398

### 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     0    

-- Highest concentration of TPH (mg/kg)     

Number of soil samples exceeding 915-1     

-- Highest concentration of SAR

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 No

Approximate areal extent (square feet) \_\_\_\_\_

Vertical Extent > 915-1 (in feet) \_\_\_\_\_

**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

0 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?

\_\_\_\_\_

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?

Site investigation will continue throughout the remediation process. The first further site investigation will occur throughout the pre-sampling portion of this plan.

**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.

This plan is specifically for the remediation of the pits.

Division Strategy: Divide the pit into 6-8 quadrants, allowing for focused and efficient cleanup efforts. Physical barriers will be erected to prevent cross-contamination. The layout of the divisions will be determined by the pit's physical features and the information gained from the pre-sampling work.

Operational Approach: Heavy machinery will be utilized for excavation and material handling, significantly minimizing worker direct exposure to contaminants. All operations will adhere to strict safety protocols, with personnel equipped with necessary personal protective equipment (PPE) and receiving task-specific training.

**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.

**Executive Summary**

This document presents a strategic plan for remediation of hydrocarbon contamination at the Large Discharge Pit (Facility ID 116587) at the Ilse Dome Tank Battery, emphasizing adherence to environmental standards, regulatory compliance, and safety and efficiency. It outlines a comprehensive approach to address contaminants, primarily focusing on hydrocarbons due to black oil carryover, with a commitment to environmental compliance and returning the Ilse Dome Field to production.

**Project Overview**

The objective is to remediate hydrocarbon contamination, facilitating the safe and productive reuse of the Ilse Dome Field. The plan spans from May 1, 2024, to July 1, 2024, within a timeline that accommodates environmental and operational considerations to minimize adverse impacts.

**Contaminant Focus and Remediation Strategy**

- Primary Contaminants: Hydrocarbons, specifically Total Petroleum Hydrocarbons (TPH), identified from black oil in production water.
- Sampling and Analysis: Pre-remediation will involve 20 - 80 sample holes along the bottom and sides of the pit to determine the contamination extent, focusing initially on visual indicators of contamination. Samples will also be sent to a lab during this stage to determine the extent and depth of the contamination. This sampling will lead to an analysis that will help with better planning and timing estimates of future work on the pit.
- Regulatory Compliance: All activities will conform to ECMC rules and regulations, timing stipulations from CPW, and any other applicable regulatory rules while ensuring environmental safety and compliance.

**Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 1000

\_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ 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.

[Empty rectangular box for monitoring plan details]

# 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 Soil Results \_\_\_\_\_

## 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.

Operator anticipates the remaining cost for this project to be: \$ 250000 \_\_\_\_\_

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation?    No \_\_\_\_\_

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.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules with an approved Colorado Parks and Wildlife seed mix after completion of remediation.

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. 06/28/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/28/2022

Proposed site investigation commencement. 03/31/2023

Proposed completion of site investigation. 07/28/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/31/2023

Proposed date of completion of Remediation. 08/01/2024

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**

During the third quarter of 2025, no fieldwork was conducted. However, progress has continued through ongoing coordination with the landowner, including a productive conference call to facilitate future site access.

Additionally, we are actively addressing project-related matters with our legal counsel and maintaining ongoing communication with ECMC.

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

Signed: Rebecca Podio

Title: Petroleum Engineer

Submit Date: 10/28/2025

Email: rpodio@gmail.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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 28244

**COA Type****Description**

1 COA	<p>Operator is non-compliant with ECMCs rules.</p> <p>ECMC has processed this form as an update; and this approval of this form does not imply any agreement with comments on completion of site investigation or remediation activities. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.</p>
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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**

404413208	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

Environmental	<p>ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location.</p> <p>Per Rule 912.a.(1-2): Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and may request expedited review if necessary.</p> <p>Operator shall conduct work in compliance with approved workplans and the 900 Series Rules. Operator shall provide a replacement form documenting investigation and clean up of these impacts; if a form providing this information is in process no replacement Form is due. If Operator is requesting a schedule change under Rule 913.d.(2) Operator shall attach adequate justification for the request. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.</p>	12/02/2025
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Total: 1 comment(s)