

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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404451528
Receive Date:
12/04/2025
Report taken by:
KRIS NEIDEL

Site Investigation and Remediation Workplan (Initial 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>WESCO OPERATING INC</u>	Operator No: <u>95520</u>	Phone Numbers
Address: <u>120 S DURBIN STREET</u>	Phone: <u>(307) 5775329</u>	
City: <u>CASPER</u> State: <u>WY</u> Zip: <u>82602</u>	Mobile: <u>()</u>	
Contact Person: <u>Dave Weinert</u>	Email: <u>davew@kirkwoodcompanies.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 43457 Initial Form 27 Document #: 404451528

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: submission of soil sampling results and plan for soil excavation and sampling

SITE INFORMATION No Multiple Facilities

Facility Type: SPILL OR RELEASE Facility ID: 491239 API #: _____ County Name: MOFFAT

Facility Name: danforth hills field tank battery Latitude: 40.337116 Longitude: -108.091378

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: NWSW Sec: 32 Twp: 5N Range: 95W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use grazing

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

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) produced water and crude oil contaminated soil

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	to be determined	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.

Shut off injection pump.

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):

See previously submitted Form 19s and Site Investigation tab on this form.

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

NA / ND

Number of soil samples collected 5 -- Highest concentration of TPH (mg/kg) 5101
 Number of soil samples exceeding 915-1 5 -- Highest concentration of SAR 9.2
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No
 Approximate areal extent (square feet) 500 Vertical Extent > 915-1 (in feet) 1

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 on hillside above spill path. The sample was analyzed for Table 915-1 analytes.
- 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?
 Four soil samples were collected from 0-6 inches below ground at the source, along the spill path from the spill source approximately 400 feet and 800 feet from the spill source and at the end of the spill path plus one sample from a background area (see attached map, analysis summary table, attached analysis data and attached photos). All of the samples had Arsenic exceedances which Wesco believes are background concentrations. The source sample was the lone sample with non-Arsenic Table 915 exceedances (exceedances were TPH and SAR). Wesco proposes to excavate and dispose of the soil exceeding Table 915-1 standards and then collect soil samples to confirm the remaining soil meets Table 915-1 standards and request spill closure. All of the samples will be analyzed for Table 915-1 constituents. A Form 27s will be submitted with the results of the excavation and subsequent analysis.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.
 Based on the results of the completed sampling (see Site Investigation Report tab), soil exceeding Table 915-1 limits will be excavated and disposed of at a permitted 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.
 Soil excavation and disposal at a permitted facility.

Soil Remediation Summary

- In Situ
 - _____ Bioremediation (or enhanced bioremediation)
 - _____ Chemical oxidation
- Ex Situ
 - _____ Excavate and offsite disposal
 - _____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ 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.

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

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: _____

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.

Reclamation will be completed as needed after approval by ECMC to close this spill.

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. 08/25/2025

Actual Spill or Release date, or date of discovery. 08/23/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/23/2025

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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 provides the results of the recent soil sampling for this spill and proposed excavation and confirmation sampling work.

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

Signed: Dave Weinert

Title: HSE Coordinator

Submit Date: 12/04/2025

Email: davew@kirkwoodcompanies.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: 12/05/2025

Remediation Project Number: 43457

COA Type**Description**

	The source of the spill has not been delineated. Samples shall be collected where the spill exited the building, fluid was observed on 3 sides of the building. Samples shall be collected that defines the entire spill source.
	a Form 19 for spill 491239 shall be submitted requesting closure for the spill with work proceeding in this project.
	Samples shall be collected from areas most likely to have been impacted, in accordance with Rule 915.e.(2)B.
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**

404451528	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
404458637	ANALYTICAL RESULTS
404458871	ANALYTICAL DATA SUMMARY TABLE(S)
404458969	PHOTO DOCUMENTATION
404458970	PHOTO DOCUMENTATION
404458977	PHOTO DOCUMENTATION
404458993	PHOTO DOCUMENTATION
404458997	PHOTO DOCUMENTATION
404459000	PHOTO DOCUMENTATION
404459003	PHOTO DOCUMENTATION
404459006	PHOTO DOCUMENTATION
404459008	PHOTO DOCUMENTATION
404459009	PHOTO DOCUMENTATION
404460978	AERIAL IMAGE
404462564	FORM 27-INITIAL-SUBMITTED

Total Attach: 15 Files

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

Environmental	ECMC staff changed the facility id to spill ID 491239 from the tank battery # 435765	12/05/2025
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Total: 1 comment(s)