

State of Colorado  
Energy & Carbon Management Commission

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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>GILS HOT OIL SERVICE</u>	Operator No: <u>34162</u>	Phone Numbers Phone: <u>(970) 946-3761</u> Mobile: <u>( )</u>
Address: <u>P O BOX 418</u>		
City: <u>STRASBURG</u>	State: <u>CO</u>	Zip: <u>80136</u>
Contact Person: <u>Jacob Harter</u>	Email: <u>jharter@cottonwoodconsulting.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41339 Initial Form 27 Document #: 404186582

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>WELL</u>	Facility ID: _____	API #: <u>057-06281</u>	County Name: <u>JACKSON</u>
Facility Name: <u>STATE 12-2 (OWP)</u>	Latitude: <u>40.759270</u>	Longitude: <u>-106.103220</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>12</u>	Twp: <u>9N</u>	Range: <u>78W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Medicine Bow Ditch is approximately 110' to the east.

**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	TBD	Visual/Sampling

**INITIAL ACTION SUMMARY**

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

The ECMC Orphan Well Program plugged the State #12-2 (OWP) well and decommissioned the wellsite during the summer of 2025. The well was plugged and abandoned (P&A) in the summer of 2025. Soil samples were collected in accordance with the initial Form 27 and ECMC Rule 915.e (2)B. A total of two soil samples were collected from the site during the plugging and decommissioning activities; one discrete soil sample was collected from the P&A wellhead excavation, and one discrete soil sample was collected from under removed above ground storage tank (AST). All samples were submitted for laboratory analysis of Table 915-1 constituents.

**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 ):

All areas suspected of having potential impacts, including the wellhead, associated flowline(s) (if present), and production equipment (if present), were visually inspected and field screened with a PID. Using these observations and field screening results, soil samples were collected from areas most likely to be impacted.

A total of two discrete soil sample were collected from the site, one discrete soil sample was collected from the P&A wellhead excavation, and one discrete soil sample was collected from beneath the removed AST. Prior to collecting soil samples, soils were field screened using a PID and visual/olfactory observations. All samples were submitted for laboratory analysis of Table 915-1 constituents. The attached project map provides the location of all samples.

**Proposed Groundwater Sampling**

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

No groundwater was encountered during the plugging and decommissioning activities. No groundwater samples were collected.

**Proposed Surface Water Sampling**

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

No surface water was encountered during the plugging and decommissioning activities. No surface water samples were collected.

**Additional Investigative Actions**

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

Further site investigation is required to determine the extent of remaining impacts.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 2

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 0

### NA / ND

-- Highest concentration of TPH (mg/kg) 13698

Highest concentration of SAR           

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?

A total of one background soil sample was collected from nearby, non-impacted native soil to establish background concentrations. Additionally, two other background soil samples were collected for the Northwest 14 Well Plugging Project. The background soil samples were analyzed for Table 915-1 inorganic constituents. A background soil sample table of results is provided in the attachments. The background soil samples indicated arsenic, pH and boron above the ECMC Table 915-1 standards. It is requested that background concentrations be considered when evaluating this site for final closure.

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?

Result of soil sample (SS01) collected from the P&A wellhead excavation at a depth of 7' below ground surface (bgs) indicate TPH values exceeded the ECMC Table 915-1 standards. Further site investigation is necessary within this area to fully define the horizontal and vertical extent of impacts. A reduced list of analytes is requested for future investigation/sampling to only include the analytes (TPH) that failed during the initial sampling event.

Results of soil sample (SS02) collected beneath the removed AST at a depth of 0-1.5 feet bgs indicate pH and SAR values exceeded the ECMC Table 915-1 standards. Further site investigation is necessary within this area to fully define the horizontal and vertical extent of impacts. A reduced list of analytes is requested for future investigation/sampling to only include the analytes (SAR and pH) that failed during the initial sampling event. Additionally, any exceedances defined under "Soil Suitability for Reclamation" will be addressed during the reclamation phase of the project.

## 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.

Further site investigation is necessary within the area of the P&A wellhead and AST to fully define the horizontal and vertical extent of impacts.

## REMEDATION 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.

Remediation will consist of removal of impacted soil and disposal at an approved disposal facility.

### **Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

Yes \_\_\_\_\_ Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 50  
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.

The scope of work described in this Initial Site Investigation and Remediation Workplan will be completed by the ECMC Orphaned Well Program. The ECMC is not an oil and gas operator.

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

## 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?    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.

Final reclamation will be conducted per ECMC reclamation rules and prioritized based on OWP funding and staff availability. Any exceedances defined under "Soil Suitability for Reclamation" within Table 915-1 are addressed during a later reclamation phase of the project. The scope of reclamation planning for this site will include a plan to address and avoid any effect on reclamation from 915-1 inorganic exceedances that are documented on this form; and will be accessible to ECMC staff upon request once developed. ECMC remains responsible for monitoring, maintenance, and management of all sites until passing final reclamation. This includes, but is not limited to, tasks such as weed control, installation and maintenance of storm water controls, and re-seeding until the site meets ECMC final reclamation standards. For questions regarding reclamation activities please contact ECMC OWP Reclamation Project Manager at (970) 946-9107.

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. 05/01/2027

Proposed date of completion of Reclamation. 11/01/2027

## 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. \_\_\_\_\_

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/01/2025

Proposed site investigation commencement. 08/25/2025

Proposed completion of site investigation. 12/01/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/01/2026

Proposed date of completion of Remediation. 11/01/2026

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:

**OPERATOR COMMENT**

Soil sample (SS01) collected from the P&A wellhead excavation had TPH values exceeding ECMC Table915 standards. Soil sample (SS02) collected beneath the removed AST had SAR and pH values exceeding ECMC Table915-1 standards. Further site investigation is necessary to fully define the horizontal and vertical extent of impacts in the area of the P&A wellhead and removed AST. A reduced list of analytes is requested for future investigation/sampling events to only include the analytes (TPH, SAR, and pH) that failed during the initial sampling event.

This Form 27 is being submitted on behalf of the ECMC OWP.

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

Signed: Jacob Harter

Title: Consultant

Submit Date: 10/14/2025

Email: jharter@cottonwoodconsulting.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: 12/17/2025

Remediation Project Number: 41339

**COA Type****Description**

	Annual reporting is approved.
	A depth to groundwater estimation shall be provided.
	Per Rule 915.e.(2).C.the modified list of contaminants of concern is approved as requested.
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**

404365026	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404365073	ANALYTICAL RESULTS
404365077	ANALYTICAL DATA SUMMARY TABLE(S)
404365095	SOIL SAMPLE LOCATION MAP
404365186	PHOTO DOCUMENTATION
404378114	MAP
404378117	ANALYTICAL RESULTS
404477984	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)