

State of Colorado  
Energy & Carbon Management Commission

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404401137  
Receive Date:  
12/12/2025

Report taken by:  
RICK ALLISON

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>MAGPIE OPERATING INC</u>	Operator No: <u>52530</u>	Phone Numbers Phone: <u>(970) 669-6308</u> Mobile: <u>( )</u>
Address: <u>2707 SOUTH COUNTY RD 11</u>		
City: <u>LOVELAND</u>	State: <u>CO</u>	Zip: <u>80537</u>
Contact Person: <u>Seyma Yilmaz</u>	Email: <u>seyma.magpieoil@gmail.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33419 Initial Form 27 Document #: 403566521

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>069-06114</u>	County Name: <u>LARIMER</u>
Facility Name: <u>HALE 3</u>	Latitude: <u>40.351373</u>	Longitude: <u>-105.047126</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>31</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>307132</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>HALE-65N68W 31SWSE</u>	Latitude: <u>40.351403</u>	Longitude: <u>-105.047550</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>31</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: SPILL OR RELEASE Facility ID: 488488 API #: \_\_\_\_\_ County Name: LARIMER  
 Facility Name: Hale 3 Flowline Separator Latitude: 40.351172 Longitude: -105.041398  
 \*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
 QtrQtr: SWSE Sec: 31 Twp: 5N Range: 68W Meridian: 6 Sensitive Area? No

Facility Type: SPILL OR RELEASE Facility ID: 488489 API #: \_\_\_\_\_ County Name: LARIMER  
 Facility Name: Hale 3 Wellhead Latitude: 40.351373 Longitude: -105.047126  
 \*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
 QtrQtr: SWSE Sec: 31 Twp: 5N Range: 68W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Residential  
 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**

Pond ~300' northwest of wellhead and residence ~150' west of wellhead. The site is in HPH within Bald Eagle Active Nest Site Half 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) \_\_\_\_\_

**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	NA	Not encountered
Yes	SOILS	18'x10' and 17'x13'	Soil samples/laboratory analytical results

**INITIAL ACTION SUMMARY**

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

Initial site assessment was conducted on 1/26/2024; 4 samples were collected at wellhead on 1/26/2024 and 1 sample at the flowline endpoint on 2/1/2024. FL-22-07 @ 4' indicated TPH (770 mg/kg) and SAR (10.1) exceedances and EX-SS-02 @ 4' exceeded local clean-up levels for Arsenic (7.77 mg/kg).

Excavation was conducted on 8/28/2024; excavation samples were collected at the wellhead and flowline endpoint on 9/6/2024. Wellhead confirmation sample, EX-SS-E06 @ 5' indicated TPH exceeded (1049 mg/kg). Additionally, confirmation samples at the Flowline endpoint indicated exceedances; FLEX-E01 @ 4' (679 mg/kg), FL-EX-S01 @ 4' (622 mg/kg), FL-EX-W01 @ 4' (4587 mg/kg) and SAR (21.5), and FL-SS-09 @ 5' (7399 mg/kg) ad SAR (17.7).

Excavation was conducted at the flowline endpoint on 10/2/2024 on the floor and west wall; confirmation samples were collected on 10/2/2024. These samples indicated exceedances for SAR only; F-EX-W02 @ 4' SAR (11.1) and FL-SS-10 @ 6' SAR (10.8).

Excavation was conducted on 11/4/2024 at the wellhead and flowline endpoint; confirmation samples were collected in 11/18/2024. Samples at the wellhead and flowline endpoint indicated that TPH were compliant with Table 915-1. SAR exceedances were indicated at the Flowline endpoint rootzone at 3.5' bgs and wellhead at 7' and 8' bgs. Additionally, confirmation samples and rootzone samples at the wellhead and separator show that there are Boron and pH exceedances; background samples indicate that the local level for pH is 8.77 and Boron is 11.4.

Delineation soil samples were collected on 9/4/2025 at the wellhead and flowline endpoint. Analytical samples collected at the wellhead showed no exceedances for SAR. Flowline analytical showed SAR exceeds Table 915-1 concentration levels. Magpie proposes to treat the SAR exceedances in place during reclamation and respectfully requests a No Further Action at the wellhead only. The Flowline will continue site assessment under a new Remedial Project.

## 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 ):

### 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

Number of soil samples collected 45

Number of soil samples exceeding 915-1 17

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

Approximate areal extent (square feet) 401

#### NA / ND

--        Highest concentration of TPH (mg/kg) 7130

--        Highest concentration of SAR 21.5

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

#### 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?

[Empty text box]

Were background samples collected as part of this site investigation?

8 BG samples at 4', 5', and 7' bgs were collected. Arsenic Local Clean-Up Level is 1.25 \* BG avg (6.33 mg/kg) = 7.58 mg/kg. Additionally, background samples indicate that the local level for pH is 8.77 and Boron is 11.4.

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

Volume of solid waste (cubic yards) 102

Volume of liquid waste (barrels) 0

Is further site investigation required?

[Empty text box]

**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.

Facility has been decommissioned. Impacted soils will be removed and transported to Pawnee Waste. SAR exceedances will be treated in situ during reclamation activities.

**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.

Impacted soils have been excavated and properly disposed of. SAR exceedances will be treated in situ during reclamation activities. 1,000 lbs/acre of pelletized gypsum, 250 lbs/acre of elemental sulfur, 200 lbs/acre of Humic Acid, and 100 lbs/acre of mycorrhizal fungi. Application of Fertilizer: 2,000 lbs/acre of Sustane 4-6-4 slow release organic fertilizer.

**Soil Remediation Summary**

In Situ

Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 102

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

Yes 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   

**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.

Magpie Operating, Inc. 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: \$ 0

**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 102

E&P waste (solid) description Contaminated dirt

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: Pawnee Waste

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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.

SAR exceedances will be treated in place. 1,000 lbs/acre of pelletized gypsum, 250 lbs/acre of elemental sulfur, 200 lbs/acre of Humic Acid, and 100 lbs/acre of mycorrhizal fungi. Application of Fertilizer: 2,000 lbs/acre of Sustane 4-6-4 slow release organic fertilizer. Planting will be coordinated with the surface owner or in accordance with ECMC 1000 Series Reclamation Rules.  
Wellhead location is residential and is not used for cropland; SAR exceedances at depth will not impact current land use.

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. 12/01/2025

Proposed date of completion of Reclamation. 12/01/2027

## 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. 10/23/2024

Actual Spill or Release date, or date of discovery. 02/01/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/01/2023

Proposed site investigation commencement. 01/26/2024

Proposed completion of site investigation. 09/04/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/28/2024

Proposed date of completion of Remediation. 12/01/2025

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**

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

Signed: Amber Barnett

Title: Compliance Specialist

Submit Date: 12/12/2025

Email: abarnett@ardorenvironmental.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: RICK ALLISON

Date: 12/22/2025

Remediation Project Number: 33419

**COA Type**

**Description**

	<p>ECMC agrees to close the project and modify the SAR level based on land use and depth of SAR that exceeds the Table 915-1 Cleanup level.</p> <p>No further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</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.

<b>Att Doc Num</b>	<b>Name</b>
404401137	FORM 27-SUPPLEMENTAL-SUBMITTED
404401230	ANALYTICAL RESULTS
404401307	SOIL SAMPLE LOCATION MAP
404405584	PHOTO DOCUMENTATION
404471534	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 5 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
Environmental	Returned to draft: 1. Revise tables with correct GPS information for sample locations. 2. Revise closure to address the well area only. 3. Submit an Initial Form 27 for further investigation of soil suitability exceedances at the separator.	12/12/2025

Total: 1 comment(s)