

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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Receive Date:  
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Report taken by:  
Kari Brown

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: 1876 RESOURCES LLC	Operator No: 10821	<b>Phone Numbers</b>
Address: 1700 LINCOLN ST, STE4800		Phone: (720) 3203660
City: DENVER State: CO Zip: 80203		Mobile: ( )
Contact Person: Meredith O'Brien	Email: m.obrien@1876resources.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34478 Initial Form 27 Document #: 403711249

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: TANK BATTERY	Facility ID: 481785	API #: _____	County Name: WELD
Facility Name: Knight Pad Tank Battery	Latitude: 40.197030	Longitude: -105.041390	
** correct Lat/Long if needed: Latitude: 40.197140		Longitude: -105.042170	
QtrQtr: SWNE	Sec: 30	Twp: 3N	Range: 68W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 484607	API #: _____	County Name: WELD
Facility Name: Well #21	Latitude: 40.197030	Longitude: -105.041390	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 30	Twp: 3N	Range: 68W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SP

Most Sensitive Adjacent Land Use Occupied building

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? Yes

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

Five water well permits were identified within a 1/2-mile radius of the release; however, three of these five well permits were listed as expired and the other two were listed as application denied. The closest constructed water well (Permit #12985) is a stock well located approximately 2,735 feet northeast of the release. The nearest surface water body and wetland were identified to be Union Reservoir located approximately 2,115 feet south of the release. High priority habitat identified by Colorado Parks and Wildlife is located approximately 1,700 feet south of the release. The nearest occupied building is located approximately 600 feet west of the release. Site Location map attached as Figure 1.

**DENIED**

# 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 type="checkbox"/> Produced Water        | <input type="checkbox"/> Workover Fluids             |  |
| <input type="checkbox"/> Oil                   | <input type="checkbox"/> Tank Bottoms                |  |
| <input checked="" 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	GROUNDWATER	Unknown	GW analytical result
Yes	SOILS	~240 sqft	Soil 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.

@0850 (5/9/23) the lease operator on location noticed condensate daylighting at surface. Within 10 mins, impacted flowline identified & shut in. The spilled condensate was contained on location. On 5/10/23, ~1bbl of condensate was removed via a hydrovac. ~1 cubic yard of impacted soil was also excavated at that time and transported to Pawnee Waste, LLC, for offsite disposal.

## 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 ):

Soil sampling associated with the Northern Excavation has been completed. Impacted soils were excavated to the extent practicable and transported offsite for disposal at a licensed facility. Confirmation soil samples were collected from excavation floors and sidewalls following completion of excavation activities to evaluate remaining soil conditions. Confirmation samples were analyzed for applicable ECMC Table 915-1 parameters, including organic constituents, metals, and general soil chemistry. Laboratory analytical results demonstrate that remaining soils meet applicable screening criteria or are consistent with naturally occurring background conditions. Based on these results, no additional soil removal or soil sampling is necessary.

### Proposed Groundwater Sampling

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

Following backfilling and installation of the proposed monitoring wells, post-remediation groundwater monitoring will be conducted to verify continued compliance with Table 915 groundwater protection standards. Details regarding monitoring well installation and monitoring frequency are provided in the Backfill Request, Monitoring Well Installation & Proposed Monitoring – Northern Excavation attachment.

### Proposed Surface Water Sampling

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

No surface water sampling is proposed as part of this Form 27. Surface water is not present within the excavation area, and remediation activities have been completed within the active production pad footprint. Based on site conditions and completed confirmation sampling, surface water pathways are not applicable.

## Additional Investigative Actions

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

No additional investigative actions are proposed as part of this Form 27. All investigation, excavation, and confirmation sampling necessary to evaluate the release and support backfill have been completed.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 83 -- Highest concentration of TPH (mg/kg) 446  
 Number of soil samples exceeding 915-1 83 -- Highest concentration of SAR 25.1  
 Was the areal and vertical extent of soil contamination delineated? Yes BTEX > 915-1 No  
 Approximate areal extent (square feet) 15300 Vertical Extent > 915-1 (in feet) 9

**Groundwater**

Number of groundwater samples collected 5 Highest concentration of Benzene (µg/l) \_\_\_\_\_  
 Was extent of groundwater contaminated delineated? No ND Highest concentration of Toluene (µg/l) \_\_\_\_\_  
 Depth to groundwater (below ground surface, in feet) 10 ND Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
 Number of groundwater monitoring wells installed 4 ND Highest concentration of Xylene (µg/l) \_\_\_\_\_  
 Number of groundwater samples exceeding 915-1 2 NA Highest concentration of Methane (mg/l) \_\_\_\_\_

**Surface Water**

2 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?  
 Yes. Background soil samples previously collected at the pad were used to characterize native soil conditions and support evaluation of confirmation sampling results for the Northern Excavation. Background samples were collected outside the excavation footprint in areas not impacted by release-related activities and are representative of site-wide native soil conditions. Background sample locations and summary results are provided in the Background Soil Sampling Summary & Location Map attachment submitted with this Form 27.

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?  
 No further investigation is required. Excavation, confirmation soil sampling, and background evaluation necessary to assess the release and support backfill have been completed. Laboratory analytical results indicate that remaining soils meet applicable screening criteria or are consistent with naturally occurring background conditions. No additional site investigation is required at this time. Operator will install GW monitoring wells as described in the Form 27 and attachments.

**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.  
 Release-related source material associated with the Northern Excavation has been removed through excavation. Impacted soils surrounding active wellheads were excavated in a slow, controlled, and methodical manner to maintain operational safety and protect existing infrastructure. Excavation continued until all visually impacted material was removed. Following completion of excavation, confirmation soil samples were collected from excavation floors and sidewalls to verify that impacted soils had been fully removed. Laboratory analytical results from confirmation samples demonstrate that remaining soils meet applicable screening criteria or are consistent with naturally occurring background conditions. Based on these results, no additional source removal is required.

**REMIEDIATION 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 of soil impacts associated with the Northern Excavation was accomplished through targeted excavation and offsite disposal of visually impacted material. Excavation was conducted in a controlled and methodical manner due to the proximity of active wellheads and associated infrastructure. All visually impacted soils were removed and transported to a licensed disposal facility.

Following completion of excavation, confirmation soil sampling was conducted from excavation floors and sidewalls to verify removal of release-related impacts. Confirmation samples were analyzed for applicable ECMC Table 915-1 parameters, including organic constituents, metals, and general soil chemistry. Laboratory analytical results demonstrate that remaining soils meet applicable screening criteria or are consistent with naturally occurring background conditions.

**Technical Justification**

Excavation was selected as the appropriate remedial approach based on the nature of the release, site conditions, and subsurface characteristics. Removal of visually impacted material eliminated the release source, and confirmation sampling verified that remaining soils are protective of groundwater. No active soil treatment beyond excavation was required. Detailed technical justification, subsurface characterization, and confirmation sampling results are provided in the Project Summary & Remediation Narrative – Northern Excavation attachment submitted with this Form 27.

Groundwater remediation is not proposed at this time. Groundwater evaluation associated with the Northern Excavation will be addressed through installation of additional monitoring wells following backfilling and implementation of post-remediation groundwater monitoring, as described elsewhere in this Form 27.

Based on completed remedial actions and verification sampling, soil remedial objectives for the Northern Excavation have been achieved, and the site is suitable for backfilling and continued monitoring as proposed.

**Soil Remediation Summary**

In Situ

Ex Situ

_____ Bioremediation ( or enhanced bioremediation )	Yes	Excavate and offsite disposal
_____ Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) _____ 4600
_____ 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**

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

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

No \_\_\_\_\_ 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.

Groundwater monitoring is proposed for the Northern Excavation to verify continued protection of groundwater following completion of excavation and backfilling. The existing monitoring network at the facility consists of four (4) groundwater monitoring wells located near the corners of the pad, which establish upgradient and perimeter groundwater conditions but are not sufficiently proximate to the Northern Excavation to fully evaluate near-source groundwater conditions.

To supplement the existing network, the operator proposes installation of four (4) additional groundwater monitoring wells in the vicinity of the former Northern Excavation source area. These wells are positioned to provide near-source and downgradient monitoring coverage specific to the Northern Excavation and to evaluate potential migration pathways in accordance with the ECMC Rule 900 Series.

Upon installation of all proposed wells, the facility will be monitored by a total of sixteen (16) groundwater monitoring wells, including upgradient background wells, near-source monitoring wells, downgradient compliance points, and perimeter wells. This combined monitoring network provides representative spatial coverage sufficient to evaluate groundwater conditions and verify groundwater protection.

Groundwater samples will be collected following backfilling and well installation and analyzed for applicable Table 915 groundwater protection parameters. Monitoring frequency, duration, and evaluation criteria will be implemented consistent with ECMC Rule 900 Series requirements and are intended to verify that groundwater conditions remain protective.

Proposed groundwater monitoring well locations associated with the Northern Excavation are shown on the Groundwater Monitoring Location Diagram – Northern Excavation, submitted with this Form 27.

# 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 Remediation Plan

## 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.

Cub Creek (1876 Resources) has sufficient insurance and bonding to fully address the anticipated costs of remediation, including the remaining estimated costs for this project. Cub Creek (1876 Resources) has general liability insurance and financial assurance in-compliance with ECMC rules. The cost for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. Cub Creek (1876 Resources) makes no representation or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 20000

## 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 4500

E&P waste (solid) description Contaminated soil

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

Non-ECMC Disposal Facility: Pawnee Waste, LLC, Erie landfill

Volume of E&P Waste (liquid) in barrels 19

E&P waste (liquid) description Contaminated soil

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

Non-ECMC Disposal Facility: Pawnee Waste, LLC

# 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? No

Is additional groundwater monitoring to be conducted? Yes

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.

Reclamation activities associated with the Northern Excavation will be completed following approval to backfill and completion of groundwater monitoring well installation. Backfilled areas will be graded to match surrounding pad elevations and restored to support continued production operations. Surface conditions will be stabilized to prevent erosion and ponding and to maintain safe access to wellheads and associated infrastructure. Final reclamation of the pad will be conducted in accordance with ECMC requirements and the operator's approved reclamation plan for the facility following cessation of operations.

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? No

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 01/30/2026

Proposed date of completion of Reclamation. 02/27/2026

## 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. 05/10/2023

Actual Spill or Release date, or date of discovery. 05/09/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/09/2023

Proposed site investigation commencement. 04/03/2024

Proposed completion of site investigation. 06/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/30/2025

Proposed date of completion of Remediation. 06/06/2025

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:

Site investigation completion date revised to allow for four quarters of groundwater monitoring following the installation of additional monitoring wells once backfill activities are complete. Remediation completion date revised to allow time for ECMC-approval of the biostimulation additive (attached Knight-Pad\_TPHenhanced) to be applied during backfill activities.

## OPERATOR COMMENT

All investigation, excavation, and confirmation activities associated with the Northern Excavation have been completed. Impacted source material was removed through excavation, and confirmation soil sampling verified that soils remaining in place meet applicable Table 915 groundwater protection criteria or are consistent with naturally occurring background conditions.

Excavation methods, removal limits, disposal quantities, and confirmation sampling performed to verify complete source removal are documented in the Source Removal & Excavation Summary – Northern Excavation attachment. This attachment demonstrates that release-related materials were fully removed and that excavation endpoints were achieved through controlled, methodical excavation conducted around active wellhead infrastructure.

Site characterization information used to support remediation decisions, including subsurface conditions relevant to the Northern Excavation, is summarized in the Project Summary & Remediation Narrative – Northern Excavation attachment. This information supports the selected remedial approach and demonstrates that remaining site conditions are protective following source removal and verification sampling. High-resolution subsurface characterization performed by Eagle Synergistic Optimizing Technologies, LLC is summarized in the High Resolution Site Characterization Summary – Eagle Synergistics attachment and supports interpretation of lithology and potential migration pathways used to inform excavation planning and remediation decisions.

Confirmation sampling results and comparisons to Table 915 criteria and background conditions are summarized in the Confirmation Sampling Summary & Table 915 Comparison – Northern Excavation attachment. This attachment demonstrates that confirmation results meet applicable criteria and that metals concentrations observed in confirmation samples are consistent with native background conditions rather than release-related impacts.

Background soil sample locations, depths, sample counts, and analytical results used to support evaluation of the Northern Excavation are documented in the Background Soil Sampling Summary & Location Map attachment. This attachment provides the basis for distinguishing naturally occurring soil chemistry from release-related impacts and supports interpretation of confirmation sampling results.

Supporting laboratory analytical results summaries for soil samples are provided in the Laboratory Analytical Results Summary – Northern Excavation attachment. Full laboratory reports will be transmitted to ECMC separately in the required secure format, if applicable.

Groundwater monitoring associated with the Northern Excavation will be implemented following approval to backfill and installation of additional monitoring wells. The proposed monitoring network, well installation details, sampling approach, and evaluation criteria are provided in the Backfill Request, Monitoring Well Installation & Proposed Monitoring – Northern Excavation attachment. Monitoring well locations and coverage are shown on the Groundwater Monitoring Location Diagram – Northern Excavation.

Based on the completed investigation, source removal, confirmation sampling, background evaluation, and proposed groundwater monitoring framework, sufficient data have been collected to demonstrate that remaining site conditions associated with the Northern Excavation are stable and protective of human health and the environment. Approval of this Form 27 will allow the excavation to be safely backfilled, reduce safety risks associated with open excavations within an active production facility, and support verification monitoring to confirm continued groundwater protection.

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

Signed: Meredith O'Brien

Title: Environmental Engineer

Submit Date: 01/13/2026

Email: m.obrien@1876resources.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: 34478

### COA Type

### Description

COA Type	Description
0 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.

### Att Doc Num

### Name

404503639	FORM 27 DENIED
404503703	OTHER
404503705	SITE INVESTIGATION REPORT
404503706	SOIL SAMPLE LOCATION MAP
404503707	ANALYTICAL DATA SUMMARY TABLE(S)
404503708	OTHER
404503712	ANALYTICAL RESULTS
404503714	REMEDIATION PROGRESS REPORT
404503716	REMEDIATION PROGRESS REPORT
404503718	LABORATORY ANALYTICAL REPORT

404503719	LABORATORY ANALYTICAL REPORT
404503720	LABORATORY ANALYTICAL REPORT
404503722	LABORATORY ANALYTICAL REPORT
404503725	LABORATORY ANALYTICAL REPORT
404503726	LABORATORY ANALYTICAL REPORT
404503727	LABORATORY ANALYTICAL REPORT
404503730	LABORATORY ANALYTICAL REPORT
404503732	LABORATORY ANALYTICAL REPORT
404507334	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 19 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>ECMC has not conducted a complete technical review of this form, data, or attachments but is denying this form.</p> <p>One or more of the Laboratory Analytical PDF attached to this form indicates it has been altered after lab delivery (Document # 404503727). One or more of the attached laboratory analytical reports is not secured (Document # 404503732). Operator shall resubmit the Form 27 and ensure all laboratory reports are secured and contain metadata appropriate to document any differences in created and modified dates, and/or the laboratory analytical report shall be signed with a validated signature certificate.</p>	01/15/2026
Environmental	<p>No proposed or current groundwater monitoring well locations are attached to the subject Form. Based on attachments provided under previous Forms, it appears that groundwater monitoring is being conducted in the same locations for both Remediation Projects # 34478 and # 34474.</p> <p>Operator shall discuss this overlap on the next Supplemental Form 27 and include a plan to consolidate the groundwater monitoring scopes of work under one remediation project. Operator shall provide all analytical reports, groundwater analytical summary tables and a potentiometric map depicting groundwater flow direction and gradient on each subsequent Quarterly Monitoring Report.</p>	01/15/2026
Environmental	Attachment Document # 404503708 does not appear to correspond to the footprint of the subject remediation project; the attachment better aligns with nearby Remediation Project # 34474. Operator shall ensure all attachments are directly relevant to the remediation plan.	01/15/2026
Environmental	Operator shall provide a consolidated set of analytical data summary tables and figures which include ALL soil samples collected to date on the subsequent Supplemental Form 27. Operator shall differentiate through formatting of analytical data summary tables and figures which samples remain in situ vs. which have been remediated. All organic/metals concentrations should be compared to BOTH Table 915-1 Protection of Groundwater Soil Screening Levels and Residential Soil Screening Levels.	01/15/2026

Total: 4 comment(s)