

State of Colorado  
Energy & Carbon Management Commission

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Report taken by:  
Chris Sanchez

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>INVESTMENT EQUIPMENT LLC</u>	Operator No: <u>10330</u>	<b>Phone Numbers</b>
Address: <u>558 CASTLE PINES PKWY UNIT B-4</u>		
City: <u>CASTLE PINES</u>	State: <u>CO</u>	Zip: <u>80108</u>
Contact Person: <u>Brent Bongers</u>	Email: <u>bbongers@impetroresources.com</u>	
		Phone: <u>(361) 935-5633</u>
		Mobile: <u>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38457 Initial Form 27 Document #: 404049794

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>LOCATION</u>	Facility ID: <u>413318</u>	API #: _____	County Name: <u>KIOWA</u>
Facility Name: <u>TRADE WINDS 1-28</u>	Latitude: <u>38.467590</u>	Longitude: <u>-102.682240</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>28</u>	Twp: <u>18S</u>	Range: <u>47W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488284</u>	API #: _____	County Name: <u>KIOWA</u>
Facility Name: <u>TANK BATTERY</u>	Latitude: <u>38.467282</u>	Longitude: <u>-102.681495</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>28</u>	Twp: <u>18S</u>	Range: <u>47W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>



# 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 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	60'x40'x1'	Lab 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.

During an ECMC inspection on 05/08/2024 (Doc #713601019) oil-stained soils were observed at the backside of the tank battery. The areas around the tanks where stained soil was visible were dug out, and the soil was placed on a liner with a berm built around it to prevent stormwater contamination. Soil was brought to an approved E&P disposal facility. Soil samples were collected on 01/30/2025, the results of which were presented in Form 27 Doc #404150705. On 07/15/2025, another ECMC inspection (Doc #404362019) took place at the Trade Winds #1-28 wellsite due to a "strong hydrocarbon odor that was present while driving on the highway located 200' north of the tank battery site". Inspection photos showed a recent spill that took place within containment. Approximately 47 tons of soil from the spill area were excavated and disposed of. On 08/28/2025, confirmation soil samples were collected. The results of which are presented in this report.

## 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 ):

On August 28, 2025, thirteen soil samples were collected and submitted to a NELAP-accredited laboratory for the full list of analytes in Table 915-1. Based on the analytical results, additional soil removal is required. Based on the lithography, land use, and depth to water (>50' bgs), the operator is requesting the use of residential soil screening levels.

### Proposed Groundwater Sampling

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

If groundwater is encountered during site investigation activities a grab sample will be collected as soon as practical. Groundwater samples will be submitted to a NELAP-accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-TMB, and 1,3,5-TMB using standard methods appropriate for detecting the target analytes in CECMC Table 915-1.

### 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 22

Highest concentration of TPH (mg/kg) \_\_\_\_\_

Number of soil samples exceeding 915-1 15

Highest concentration of SAR \_\_\_\_\_

Was the areal and vertical extent of soil contamination delineated? Yes \_\_\_\_\_

BTEX > 915-1 Yes \_\_\_\_\_

Approximate areal extent (square feet) 2400

Vertical Extent > 915-1 (in feet) 4

**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?

The arsenic and selenium concentrations from all soil sample locations were above the Table 915-1 standards, which are attributable to background levels.

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?

Additional soil removal and sampling is required.

**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.

Approximately 124 tons of soil were removed and disposed of in October 2024. Approximately 47 tons of soil were removed and disposed of in August 2025. Manifests are attached to this report. Any additional hydrocarbon-impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

**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.

Any additional hydrocarbon-impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

**Soil Remediation Summary**

In Situ

Ex Situ

         Bioremediation ( or enhanced bioremediation )

         Yes Excavate and offsite disposal

         Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 480

         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.

# REMEDATION 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 carries general liability insurance of \$1,000,000.00 per occurrence and \$4,000,000.00 in excess. Operator carries \$25,000.00 blanket surface surety bond. Operator's Financial Assurance meets the requirements of Rule 703.b. and General Liability Insurance meets the requirements of Rule 705.b.

Operator anticipates the remaining cost for this project to be: \$ 7000 \_\_\_\_\_

## 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 \_\_\_\_\_ 480

E&P waste (solid) description Soil

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

Non-ECMC Disposal Facility: Pawnee Waste LLC

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 0

E&P waste (liquid) description \_\_\_\_\_

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

Non-ECMC Disposal Facility: \_\_\_\_\_

# REMEDATION COMPLETION REPORT

## REMEDATION 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.

Reclamation and/or interim reclamation activities will be evaluated and presented to the CECMC for approval subsequent to additional investigation activities or successful remediation

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. 05/09/2024

Actual Spill or Release date, or date of discovery. 05/08/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/14/2024

Proposed site investigation commencement. 04/01/2025

Proposed completion of site investigation. 12/01/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/14/2024

Proposed date of completion of Remediation. 03/31/2026

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**

Based on the lithography, land use, and depth to water (>50' bgs), the operator is requesting the use of residential soil screening levels.

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

Signed: Lauren Glazier

Title: Consultant

Submit Date: 09/26/2025

Email: lglazier@cgrs.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: Chris Sanchez

Date: 01/20/2026

Remediation Project Number: 38457

**COA Type****Description**

	ECMC acknowledges the Operators request for Residential SSL and does not approve at this time.  Operator shall provide justification for use of Residential SSL including but not limited to depth to groundwater and additional information for local lithology.
	Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil  Operator shall collect confirmation soil samples for Full Table 915-1 Contaminants of Concern
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
	All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
	Operator shall continue Quarterly Reporting until the Site Assessment is completed, and the remediation area demonstrates Compliance with Full Table 915-1 Standards.
5 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**

404362019	FORM 27-SUPPLEMENTAL-SUBMITTED
404362256	DISPOSAL MANIFESTS
404362275	LABORATORY ANALYTICAL REPORT
404362279	LABORATORY ANALYTICAL REPORT
404362280	SOIL SAMPLE LOCATION MAP
404362282	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)