

State of Colorado
Energy & Carbon Management Commission

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Receive Date:

Report taken by:

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>OWN RESOURCES OPERATING LLC</u>	Operator No: <u>10699</u>	Phone Numbers
Address: <u>305 S RIDGE STREET #6279</u>	Phone: <u>(713) 6287339</u>	
City: <u>BRECKENRIDGE</u> State: <u>CO</u> Zip: <u>80424</u>	Mobile: <u>(713) 6287339</u>	
Contact Person: <u>Niels Phaf</u>	Email: <u>niels.phaf@ownresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41335 Initial Form 27 Document #: 404242638

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>SPILL OR RELEASE</u>	Facility ID: <u>489915</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>Joe Brophy 02-25</u>	Latitude: <u>40.280629</u>	Longitude: <u>-102.578104</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>25</u>	Twp: <u>4N</u>	Range: <u>47W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Non Irrigated Farm land

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

An irrigation well approximately 3831' northeast and 3161 ft northwest, designated groundwater management area, designated basin, no high priority habitat; Water depth >178 ft. Wetlands survey shows several Freshwater Emergent locations close by, however currently not present

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	High	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.

From Form 19 Initial Report Doc#404166802
Production foreman discovered a water spill during regular route maintenance with water coming up form ground about 3 feet from produced water riser. Produced water line was isolated from collection system. Water was in front of pumping unit on south side, then flowed to west and north along fencing panels. Estimated release to be about 8 bbl. Due to area being flat, no standing water for vac truck to collect. Roustabout was called for repair. Excavation of area revealed about 20 feet of steel line from wellhead riser before connection to poly pipe. Entire steel line was removed and replaced with poly pipe and excavation backfilled. Area will be treated with agricultural grade gypsum. No threat to water of the state, public water systems, residences or occupied structures, livestock, wildlife, air quality, or public maintained roads. Location is not in a high priority habitat, no notification to CPW.

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 April 16 2025, a total of four soil samples were collected—three from within the impacted area and one background sample taken approximately 60 feet southeast of the spill zone. The attached map identifies the sample locations in relation to the affected area. Both samples were submitted for laboratory analysis required per Table 915-1

Proposed Groundwater Sampling

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

No groundwater was encountered.

Proposed Surface Water Sampling

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

No surface water encountered.

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 4

Number of soil samples exceeding 915-1 4

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

Approximate areal extent (square feet) 455

NA / ND

-- Highest concentration of TPH (mg/kg) 66

-- Highest concentration of SAR 30.8

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 1

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?

One background soil sample was collected from an undisturbed area with native soils, located approximately 60 feet southeast of the spill area. The sample was analyzed for soil suitability and in accordance with Table 915-1. This background sample will serve as a baseline reference for evaluating soil conditions throughout the remainder of the reclamation project.

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?

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.

Analytical results from soil samples indicate elevated levels on EC, SAR, pH, boron, and arsenic above applicable thresholds. The impacted area will be addressed through in-place treatment.

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.

Remediation at this site has been delayed due to persistent rainy conditions, which have prevented proper soil treatment and ground preparation. The planned remediation approach includes application of Reclaim and gypsum at a rate of 1,000 lbs./acre to address elevated EC and SAR levels by displacing sodium and improving soil structure. Additionally, Soft Soil will be applied at a rate of 1 quart/acre to help dilute elevated constituents and buffer pH and boron concentrations. These amendments will be incorporated into the soil using a rototiller to a depth of approximately 12 to 18 inches, promoting compaction relief and overall soil health.

Arsenic – Request for No Further Action- results indicate that arsenic concentrations in the impacted area (Sample #1: 1.19 mg/kg), (Sample #2:1.62 mg/kg), (Sample #3: 1.82 mg/kg) are comparable to the background level (2.11 mg/kg). Although all values exceed the Table 915-1 threshold, the minimal difference between the samples and background suggests that the arsenic is naturally occurring. No treatment is proposed for arsenic at this time.

Three confirmation soil samples will be collected in Q2 2026 to verify levels. Samples will be analyzed for suitability for reclamation in accordance with applicable guidelines.

Soil Remediation Summary

<input checked="" type="checkbox"/> In Situ	<input type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	_____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
Yes _____ Natural Attenuation	_____ Excavate and onsite remediation
Yes _____ Other _____ Reclaim, Gypsum and Soft Soil	_____ 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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs. We also have an approved assurance plan under option 5

Operator anticipates the remaining cost for this project to be: \$ 750 _____

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: _____

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.

To ensure the soil amendments—Reclaim, gypsum, and Soft Soil—are properly incorporated into the soil profile, the spill area will be rototilled to a depth of approximately 12 to 18 inches. The treated area will then be leveled, and the deep tillage is expected to promote infiltration, alleviate compaction, and support root development. The location will be visually monitored following the treatment.

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. 04/16/2025

Proposed date of completion of Reclamation. 05/30/2027

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. 04/16/2025

Actual Spill or Release date, or date of discovery. 04/15/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/15/2025

Proposed site investigation commencement. 04/15/2025

Proposed completion of site investigation. 06/11/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/16/2025

Proposed date of completion of Remediation. 12/01/2026

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

This update is for quarterly reporting. No significant work has been done since last Form 27 I submission. COA's from doc#404242638 are addressed below:

1. Lateral and vertical impact are fully delineated by the 3 samples within the area and 1 background sample. Sample map shows lateral and vertical impact of the spill area and the 4 sample points distributed across the spill area and the background.
2. Residential SSL can be used for the following reasons 1) One of the closest water wells ~3100' was drilled to ~300' and noted a static water level at 182' deep. The lithology in the well described from cuttings has multiple thick clay zones, which act as impermeable barriers making it difficult for anything from the subsurface to migrate to the much deeper water bearing zone. 2) No groundwater or surface water was encountered at the location.
3. The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area. As a remediation method for the boron exceedance SOIL SOFT will be applied for soil conditioning. This will be incorporated into the soil using a rototiller to a depth of approximately 12 to 18 inches to reduce compaction and promote soil health, promote water infiltration and remediation.
4. Operator will re-sample sample 1, 2, 3 and background for Table 915-1 analytes in 2Q2026 to verify levels. Noted on the alternative remediation should analytes still exceed table 915-1 in April 2027.

Remediation at this site has been delayed due to persistent rainy conditions, which have prevented proper soil treatment and ground preparation.

Operator is requesting to provide semi-annual updates on progress to make updates more substantial.

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

Signed: Azucena Torres

Title: Remediation & Reclamation

Submit Date: _____

Email: azucena.torres@ownresources.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: 41335

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

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Total Attach: 0 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)