

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Collin Metz

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: <u>TEP ROCKY MOUNTAIN LLC</u>	Operator No: <u>96850</u>	Phone Numbers
Address: <u>1058 COUNTY ROAD 215</u>		
City: <u>PARACHUTE</u>	State: <u>CO</u>	Zip: <u>81635</u>
Contact Person: <u>Michael Gardner</u>	Email: <u>michael.gardner@flywheelenergy.com</u>	Phone: <u>(970) 263-2760</u>
		Mobile: <u>(970) 623-4875</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41073 Initial Form 27 Document #: 404220825

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>PIT</u>	Facility ID: <u>489326</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>South Leverich 13-09 Cutting Trench</u>	Latitude: <u>39.435343</u>	Longitude: <u>-107.828970</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>13</u>	Twp: <u>7S</u>	Range: <u>94W</u>
	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use Rangeland
 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

Nearest water well (Permit # 314384) is located ~1,357 to the east. Nearest surface water is located ~927 feet to the west.

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	SOILS	None	Confirmation soil 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 purpose of this Form 27 is to request permanent closure of the cuttings trench located at the South Leverich 13-09 well pad. This request is for the routine, planned closure of the cuttings trench. There is no historical or current spill associated with this Form 27.

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 samples will be collected in accordance with the Form 2A (Doc# 403064316) and Form 15 (Doc# 404101029) and associated Waste Management Plan (Doc# 403446844). Cuttings samples will be collected from wells as drilling occurs as well as the post mixed drill cuttings trench.

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

NA / ND

Number of soil samples collected 17

Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 0

Highest concentration of SAR _____

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

BTEX > 915-1 No

Approximate areal extent (square feet) 40375
0

Vertical Extent > 915-1 (in feet) 19

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? Yes

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) 90

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed 0

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 0

Highest concentration of Methane (mg/l) _____

Surface Water

0 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?

Samples from be nearby undisturbed adjacent property will be collected, as well as samples previously collected from nearby locations will utilized to establish a background baseline for inorganic and arsenic concentrations.

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.

N/A - Cuttings will remain onsite within the trench.

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.

Soil samples will be mixed at a 1:1 ration with material and sampled for ECMC Table 915-1 as outlined within the approved Form 15 (Doc# 404101029) and associated Waste Management Plan (Doc# 403446844)

Soil Remediation Summary

In Situ

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 # _____

____ Natural Attenuation
____ Other _____

____ 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.

None

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.

Please see TEP's current Financial Assurance Plan (see attached Form 3 Doc #403378610) that was previously approved by ECMC, and which was effective on April 26, 2023. This Financial Assurance Plan has been provided to comply with the Financial Assurance requirements outlined in the ECMC Section 700 rules and provides adequate information to fully address anticipated costs pertaining to the plugging, abandonment, and remediation of any TEP well / facility. Per ECMC's approval of this Financial Assurance Plan (Form 3), TEP's existing financial assurance levels are deemed sufficient to protect against property damage, bodily injury to personnel and contractors, or any potential releases of pollution to the environment that may threaten public health, safety, or welfare.

Operator anticipates the remaining cost for this project to be: \$ 0 _____

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? 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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Interim reclamation of the pad will be performed per the attached construction and reclamation plans. In general, clean, stockpiled fill material is added to the drill cuttings and mixed within the cuttings trench using large excavators and dozers to thoroughly mix and blend the material. The mixed material is sampled on multiple occasions throughout the mixing process to ensure that Table 915-1 cleanup standards are achieved. Once the treated / mixed cuttings materials have successfully attained Table 915-1 cleanup standards, the mixed materials are contoured within the trench. The trench is then covered (capped) with a uniform layer of clean fill material. The cap and cut-slope areas are then contoured to match the pre-existing and adjacent slopes and topography as closely as possible. Stockpiled topsoil is then spread over the recontoured areas. The interim reclamation areas are then hydro-seeded with a seed mix approved by the surface owner (BLM). This seed mix is attached. Soil amendments will also be used as needed to optimize successful germination. Storm water BMPs are installed per TEP Best Management Practice (BMP) manual to protect the newly reclaimed site and to minimize and control sediment from leaving the location. The progress and success of revegetation efforts at this location will be closely monitored by TEP staff. This location is part of TEP's annual weed spraying and control program which is designed to prevent the establishment and spread of noxious weeds.

Is the described reclamation complete? Yes

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. _____

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/08/2023

Proposed site investigation commencement. 06/08/2023

Proposed completion of site investigation. 05/09/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/08/2023

Proposed date of completion of Remediation. 05/09/2024

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

Please forward onto John Heil

This Supplemental Form 27 is being submitted to request closure of the cuttings trench located at the South Leverich 13-09 well pad. Below is the specific information associated with the cuttings trench.

Location: South Leverich 13-09
Facility ID: 489326
REM#: 41073

Drill cuttings were mixed at a 1:1 ratio with clean native soil stockpiled onsite from the construction of the cuttings trench as outlined within the Form 15 WMP (Doc# 403446844) and Initial Form 27 (Doc# 404220825).

Samples from the cuttings were collected from various depths during the drilling of the SR 324-13 well to be used for initial characterization.

Samples were collected from the cuttings trench at various depths, ensuring samples were collected from the complete vertical profile of the trench (surface to 19-feet). Sample results from the initial characterization and trench confirmation indicate drill cuttings comply with ECMC Table 915-1 thresholds with the exception to arsenic and inorganics, which are comparable to background concentrations. Refer to the attached data tables and lab reports for more information.

TEP is requesting relief to the exceeding arsenic and inorganic constituents in accordance with ECMC Table 915-1 footnote #1 and #11, as background concentrations for those same analytes are comparable and/or exceeding the confirmation concentrations within the trench.

Due to the amount of precipitation and snow fall during the drilling occupation, additional drying agents (saw dust & clean soil) were needed to obtain the necessary moisture content, therefore generating more volume and exceeding the constructed capacity of the trench. Therefore, cuttings that were generated exceeding the trench capacity were hauled to the Starkey Cuttings Trench CWMF as outlined within the approved Form 27 (Doc# 403498786 / REM# 33121) and managed in accordance with the Form 28 operating plan under Facility 476647. It is estimated that approximately 2,070 cubic yards were managed at the Starkey Cuttings Trench between the dates of 8/22/2023 and 9/22/2023.

Note: Referenced background data was collected during previous sampling events at nearby adjacent locations and is also available on the ECMC database under the following Doc#.
- RU 44-7 - Lab ID1512082 (Doc# 402631173)

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

Signed: Kris Rowe

Title: TEP Environmental

Submit Date: 07/24/2025

Email: Kris.Rowe@flywheelenergy.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: Collin Metz

Date: 02/05/2026

Remediation Project Number: 41073

COA Type

Description

	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.
	Based on the information presented, it appears that no further remedial action is necessary at this time and the ECMC approves the closure request. However, should 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.
2 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

404292905	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
404292938	ANALYTICAL DATA SUMMARY TABLE(S)
404292952	PHOTO DOCUMENTATION

404292959	SOIL SAMPLE LOCATION MAP
404292961	SOIL SAMPLE LOCATION MAP
404292962	SOIL SAMPLE LOCATION MAP
404293439	LABORATORY ANALYTICAL REPORT
404293440	LABORATORY ANALYTICAL REPORT
404534912	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)