

State of Colorado
Energy & Carbon Management Commission

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06/04/2025

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 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: 1876 RESOURCES LLC	Operator No: 10821	Phone Numbers Phone: (720) 3203660 Mobile: (720) 3203660
Address: 1700 LINCOLN ST, STE4800		
City: DENVER	State: CO	Zip: 80203
Contact Person: Meredith OBrien	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? Yes

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.

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 samples will be collected to further delineate the benzene and barium soil impacts remaining onsite. The soil samples will be submitted for laboratory analysis of Table 915-1 organics and metals (delineation of SS-03@6') or for barium only (delineation of W02@6'). Additional background soil samples will be collected from native, non-impacted areas and will be submitted for laboratory analysis of barium only. During installation of groundwater monitoring wells, a minimum of one soil sample from each boring will be submitted for laboratory analysis of the full Table 915-1 analytical suite. The sample collected will be from the interval(s) displaying the highest degree of impacts or in the absence of apparent impacts from beneath the previous excavation extent, the interval in which organic compounds were previously detected, and/or the soil-groundwater interface.

Proposed Groundwater Sampling

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

Following installation of addition groundwater monitoring wells to further delineate groundwater impacts remaining at the site, ground samples will be collected from all monitoring wells quarterly and analyzed for full Table 915-1 suite until four consecutive quarters indicate compliance with ECMC Table 915-1 standards. In order to investigate if conductive conditions exist beneath the site for effective implementation of the proposed remedial biostimulant, groundwater samples collected from the current network of monitoring wells (MW-01 through MW-04) on April 7, 2025, were also analyzed for total organic carbon and pH.

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 9
Number of soil samples exceeding 915-1 3
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 240

NA / ND

-- Highest concentration of TPH (mg/kg) 9.56
-- Highest concentration of SAR 15.2
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 12
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 10
Number of groundwater monitoring wells installed 4
Number of groundwater samples exceeding 915-1 3

Highest concentration of Benzene (µg/l) _____
ND Highest concentration of Toluene (µg/l) _____
ND Highest concentration of Ethylbenzene (µg/l) _____
ND Highest concentration of Xylene (µg/l) _____
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?

Nine (9) background samples were collected from three soil sample locations (BG01, BG02, and BG03) at depths of 2 ft, 4 ft, and 6 ft-bgs and analyzed for soil suitability, arsenic, barium, selenium, and/or lead.

Additional background soil samples will be collected from native, non-impacted areas and will be submitted for laboratory analysis of barium only.

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?

Soil samples will be collected to further delineate the benzene and barium soil impacts remaining onsite. The soil samples will be submitted for laboratory analysis of Table 915-1 organics and metals (delineation of SS-03@6') or for barium only (delineation of W02@6'). Additional background soil samples will be collected from native, non-impacted areas and will be submitted for laboratory analysis of barium only. During installation of groundwater monitoring wells, a minimum of one soil sample from each boring will be submitted for laboratory analysis of the full Table 915-1 analytical suite. The sample collected will be from the interval(s) displaying the highest degree of impacts or in the absence of apparent impacts from beneath the previous excavation extent, the interval in which organic compounds were previously detected, and/or the soil-groundwater interface.

Additional groundwater monitoring wells will be installed to fully delineate the groundwater impacts remaining at the site. Well completion/boring logs will be provided in a subsequent Form 27-Supplemental. Groundwater monitoring wells be surveyed to provide groundwater elevation gradients and flow direction.

Following installation of addition groundwater monitoring wells, ground samples will be collected from all monitoring wells quarterly and analyzed for full Table 915-1 suite until four consecutive quarters indicate compliance with ECMC Table 915-1 standards. In order to investigate if conductive conditions exist beneath the site for effective implementation of the proposed remedial biostimulant, groundwater samples collected from the current network of monitoring wells (MW-01 through MW-04) on April 7, 2025, were also analyzed for total organic carbon and pH.

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.

Excavation source removal activities were completed to address soil impacts in the release location. The excavation extent is approximately 30 feet x 13 feet, to a depth of approximately 8 feet below ground surface (bgs) with sloping due to unstable soil/sidewalls. Excavation activities were limited to the extend to the west due an active flowline and to the south due to an active separator. Addition soil delineation activities will be completed to define the benzene and barium impacts remaining onsite.

REMIATION 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 collected to further delineate the benzene and barium soil impacts remaining onsite. Additional background soil samples will be collected from native, non-impacted areas to further investigate site-specific native soil concentrations. Groundwater monitoring wells will be installed to fully delineate the groundwater impacts remaining at the site. Based on the results of the additional site characterization activities, a remedial strategy will be developed and presented in a subsequent Form 27-Supplemental.

Soil Remediation Summary

<input type="checkbox"/> In Situ _____ Bioremediation (or enhanced bioremediation) _____ Chemical oxidation _____ Air sparge / Soil vapor extraction _____ Natural Attenuation _____ Other _____	<input checked="" type="checkbox"/> Ex Situ Yes _____ Excavate and offsite disposal If Yes: Estimated Volume (Cubic Yards) _____ 22 Name of Licensed Disposal Facility or ECMC Facility ID # _____ _____ Excavate and onsite remediation _____ Land Treatment _____ Bioremediation (or enhanced bioremediation) _____ Chemical oxidation _____ Other _____
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Groundwater Remediation Summary

Yes _____ 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.

Additional groundwater monitoring wells will be installed to fully delineate the groundwater impacts remaining at the site. Well completion/boring logs will be provided in a subsequent Form 27-Supplemental. Groundwater monitoring wells be surveyed to provide groundwater elevation gradients and flow direction.

Following installation of addition groundwater monitoring wells, ground samples will be collected from all monitoring wells quarterly and analyzed for full Table 915-1 suite until four consecutive quarters indicate compliance with ECMC Table 915-1 standards. In order to investigate if conductive conditions exist beneath the site for effective implementation of the proposed remedial biostimulant, groundwater samples collected from the current network of monitoring wells (MW-01 through MW-04) on April 7, 2025, were also analyzed for total organic carbon and pH.

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.

1876 Resources has sufficient insurance and bonding to fully address the anticipated costs of remediation, including the remaining estimated costs for this project. 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. 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 _____ 22

E&P waste (solid) description Contaminated soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Pawnee Waste, LLC

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

E&P waste (liquid) description Contaminated groundwater

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 will be in accordance with ECMC 1000 Series Rules.

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. 08/31/2025

Proposed date of completion of Reclamation. 09/30/2025

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. 07/31/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/03/2024

Proposed date of completion of Remediation. 08/31/2025

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

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

Signed: Meredith OBrien

Title: Environmental Engineer

Submit Date: 06/04/2025

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: Kari Brown

Date: 02/27/2026

Remediation Project Number: 34478

COA Type**Description**

	ECMC has accepted this Form into the record. Operator shall comply with the workplan, timeline, and any conditions of approval for Form 27 Doc No 404519595 submitted 2/10/2026 (approved 2/20/2026).
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.

Att Doc Num**Name**

404229742	FORM 27-SUPPLEMENTAL-SUBMITTED
404229772	LABORATORY ANALYTICAL REPORT
404229774	GROUND WATER SAMPLE LOCATION
404229775	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)