

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
404437537
Receive Date:
12/29/2025
Report taken by:
Alexander Ahmadian

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>BEHRENS RESOURCES INC</u>	Operator No: <u>10695</u>	Phone Numbers
Address: <u>PO BOX 188</u>		Phone: <u>(303) 894-2100</u>
City: <u>DEER TRAIL</u> State: <u>CO</u> Zip: <u>80135</u>		Mobile: <u>(303) 905-5341</u>
Contact Person: <u>James Hix - East OWP EPS</u>	Email: <u>james.hix@state.co.us</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37117 Initial Form 27 Document #: 403929488

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>LOCATION</u>	Facility ID: <u>475504</u>	API #: _____	County Name: <u>ADAMS</u>
Facility Name: <u>FARM RANCH EXPLORATION-62S64W 34SENW (OWP)</u>		Latitude: <u>39.833323</u>	Longitude: <u>-104.536508</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>34</u>	Twp: <u>2S</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Cropland, Rangeland
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

There is one DWR Permitted Domestic water well w/in 1/4-mile. DWR Permit #120758- Receipt #0216382 (1982) [SWL = 160 ft, Top of Perf Casing = 306 ft (DTW), TD = 366, Distance ~450 N] There are 11 DWR Permitted Monitoring Holes (Anadarko Petroleum/Kerr McGee) (2012) associated with the former Radar Compressor Station located north of Behrens Resources Farm Ranch Exploration shared tank battery. DWR Permit #287829- Receipt #3654511C [DTW = 102 ft, Top of Perf Casing = 90 ft, TD = 110 ft, On location], Groundwater Depth: ~100 ft bgs. Surface Water: Unnamed intermittent tributary drainage to West Sand Creek ~1515 ft WNW, NWI Mapped Wetlands: Freshwater Emergent (1600 ft SW) Riverine along the drainage (1515 ft WNW); No CPW mapped high priority habitats (HPH) within 1/4-mile. There are no residential building units (RBU) located w/in 1/4-mile of the location.

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
UNDETERMINED	SOILS	UNKNOWN	VISUAL, FIELD SCREENING, ANALYTICAL

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

This oil and gas Location is in the Colorado Energy and Carbon Management Commission (ECMC) Orphaned Well Program (OWP). This Form 27 Supplemental presents results of site investigation activities performed during decommissioning of Oil and Gas Facilities, specifically sampling beneath production equipment including aboveground storage tanks (AST), produced water vaults (PWV), separators, on-location and off-location flowlines. Soil samples were submitted to an accredited environmental laboratory for analysis of full Table 915-1 parameters from beneath each piece of equipment, at flowline risers and connection points, and from the base of the excavation. Soil samples were collected and analyzed in accordance with Colorado ECMC 900 Series Rules.

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):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds [metals (As, Ba, Cd, Cu, Cr6+, Pb, Ni, Ag, Zn) and soil suitability for reclamation parameters (pH, EC, SAR, hot water soluble boron)].

Proposed Groundwater Sampling

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

Groundwater samples are not expected to be collected as part of this investigation. If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this investigation.

Additional Investigative Actions

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

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 15000

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 12.7
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 2

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?

A site-specific background soil sample, BG02, was collected east of the former Farm Ranch #1, #2, #3 Tank Battery. Additional site-specific background soil samples collected from undisturbed areas with similar soil characteristics away from historic oil and gas facilities will be collected during future OWP phases of work. Background samples will be submitted for analysis of Table 915-1 metals and soil suitability for reclamation parameters.

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?

Further site investigation is required to delineate the lateral and vertical extent of E&P Waste impacts, specifically in the vicinity of the separator on the south end of the tank battery Location. A spill was noted at the base of the separator with impacted soil removed during site decommissioning.

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.

If E&P Waste impacts are encountered during decommissioning of Oil and Gas Facilities, approximately 10 cubic yards of impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

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.

If E&P Waste impacted soils are encountered, approximately 10 cubic yards of the impacted soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under an approved supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site conditions.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ 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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

A supplemental Form 27 will be submitted within 90 days from results receipt

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.

The former BEHRENS RESOURCES INC - 10695 FARM RANCH EXPLORATION-62S64W/34SEW (Location ID #475504) is in the ECMC Orphaned Well Program. The former Operator's bond and/or other funding will be used to decommission, investigate, remediate, and reclaim the oil and gas location.

Operator anticipates the remaining cost for this project to be: \$ 11501

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: _____

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? _____

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.

The Colorado ECMC OWP will prepare a reclamation plan to reclaim this oil and gas location in accordance with 1000 Series Rules including grading/recontouring of disturbed areas. The reclamation plan will be implemented under a separate phase of work. Final reclamation will be conducted per ECMC 1000 Series Rules and prioritized based on OWP ranking, project funding, and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

Is the described reclamation complete? _____

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. 01/22/2025

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/31/2025

Proposed site investigation commencement. 08/14/2025

Proposed completion of site investigation. 08/27/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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

The former BEHRENS RESOURCES INC - 10695 FARM RANCH EXPLORATION #1,#2,#3 Tank Battery, FARM RANCH EXPLORATION-62S64W/34SEW (Location ID #475504) is in the ECMC Orphaned Well Program ("OWP"). This Form 27 Supplemental presents soil sample results following decommissioning of the shared tank battery. Three soil samples were collected at a depth of 1.5 ft bgs from beneath the heater treater (SS01), AST (SS02), and AST (SS03). Analytical results for all three soil samples reported arsenic above the Table 915-1 Residential soil screening level. Analytical results for barium were reported above the Table 915-1 Protection of Groundwater SSL in all three soil samples. Arsenic and barium were also reported in site-specific background soil sample, BG02, collected east of the tank battery at 1 ft bgs. Analytical results indicated the EC (5.79 mmohs/cm) and SAR (12.7) were reported above the Table 915-1 soil suitability for reclamation in soil sample SS01 collected beneath the heater treater/seperator. Further site investigation and remediation are required to meet the Table 915-1 cleanup concentrations/ levels. Groundwater is estimated at between 90 ft and 100 ft bgs based on groundwater levels measured in monitoring wells at the adjacent former Anadarko/Kerr McGee Radar Compressor Station. The OWP will oversee future site investigation and remediation work under Remediation Project #37117.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 12/29/2025

Email: james.hix@state.co.us

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: Alexander Ahmadian

Date: 03/13/2026

Remediation Project Number: 37117

COA Type**Description**

	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
	Background samples were collected from areas off-location and are not representative of background conditions near the facility. These samples shall be omitted from future background determination calculations. Operator shall obtain samples from locations sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
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**

404437537	FORM 27-SUPPLEMENTAL-SUBMITTED
404462662	ANALYTICAL DATA SUMMARY TABLE(S)
404462664	ANALYTICAL RESULTS
404462665	SOIL SAMPLE LOCATION MAP
404462666	SOIL SAMPLE LOCATION MAP
404462667	ANALYTICAL RESULTS
404462669	PHOTO DOCUMENTATION
404462670	SITE INVESTIGATION REPORT
404462671	ANALYTICAL DATA SUMMARY TABLE(S)
404462673	MAP
404462674	PHOTO DOCUMENTATION
404462676	ANALYTICAL RESULTS
404487382	DISPOSAL MANIFESTS
404487384	DISPOSAL MANIFESTS
404487453	CORRESPONDENCE

Total Attach: 15 Files

General Comments

User Group

Comment

Comment Date

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

Total: 0 comment(s)