

State of Colorado
Energy & Carbon Management Commission

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



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404264384
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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>P O & G OPERATING LLC</u>	Operator No: <u>10634</u>	Phone Numbers
Address: <u>5847 SAN FELIPE SUITE 3200</u>		
City: <u>HOUSTON</u>	State: <u>TX</u>	Zip: <u>77057</u>
Contact Person: <u>Rick Eggleston</u>	Email: <u>rick_eggleston@pogresources.com</u>	
		Phone: <u>(346) 220-8355</u>
		Mobile: <u>(720) 641-8661</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33643 Initial Form 27 Document #: 403634931

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>470605</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>Nininger Battery</u>	Latitude: <u>38.694615</u>	Longitude: <u>-102.420362</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>Lot 4</u>	Sec: <u>1</u>	Twp: <u>16S</u>	Range: <u>45w</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488360</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>Nininger Tank Battery</u>	Latitude: <u>38.694615</u>	Longitude: <u>-102.420362</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>Lot 4</u>	Sec: <u>1</u>	Twp: <u>16S</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications ML _____

Most Sensitive Adjacent Land Use Agriculture, cropland _____

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

Site is within HPH (Lesser Prairie Chicken Estimated Occupied Range)

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 checked="" 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
No	GROUNDWATER	N/A	Excavation done in area
Yes	SOILS	TBD	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.

The Nininger TB location will be decommissioned in accordance with ECMC Rule 911.a and ECMC Rule 913.c.(1). Soil and groundwater (if encountered) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with ECMC Table 915-1. The Topographic Site Location Map showing the geographic setting of the site as well as proposed soil sample maps for the TB and 3 tanks are attached.

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):

Following facility decommissioning activities, discrete soil samples will be collected from the surfaces and the excavation areas underneath the separator and three above ground storage tanks. In the absence of apparent impacts, soil samples will be submitted to an accredited laboratory for benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-TMB, 1,3,5-TMB, total petroleum hydrocarbons (TPH (C6-C36)), pH, EC, SAR, boron. 2 background samples will be collected at location of comparable, nearby, non-impacted native soil. Proposed soil sample locations are provided.

Proposed Groundwater Sampling

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

If groundwater is encountered during facility decommissioning activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene, using standard methods appropriate for detecting the target analytes in ECMC 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 29

ND Highest concentration of TPH (mg/kg) _____

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.

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 Quarterly report on progress of site investigation and remediation

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.

PO&G Operating LLC, has complied with General Liability Insurance requirement per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 5000

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:

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

The site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules Per surface owner direction.

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. 10/20/2025

Proposed date of completion of Reclamation. 10/31/2025

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. 09/25/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/29/2023

Proposed site investigation commencement. 01/08/2024

Proposed completion of site investigation. 01/26/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/22/2024

Proposed date of completion of Remediation. 05/13/2024

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

This is a Request for Closure. The original request was filed on 1/9/25 and was denied on 4/21/25 due to analytical data not being adequately protected to ECMC standards.

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

Signed: Rick Eggleston

Title: EHS&R Project Coordinator

Submit Date: 07/01/2025

Email: rick_eggleston@pogresources.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: 03/13/2026

Remediation Project Number: 33643

COA Type**Description**

	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.
	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.

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**

404264384	FORM 27-SUPPLEMENTAL-SUBMITTED
404264387	DISPOSAL MANIFESTS
404264388	DISPOSAL MANIFESTS
404264389	DISPOSAL MANIFESTS
404264390	DISPOSAL MANIFESTS
404264391	DISPOSAL MANIFESTS
404264392	DISPOSAL MANIFESTS
404264393	DISPOSAL MANIFESTS
404264394	DISPOSAL MANIFESTS
404264395	DISPOSAL MANIFESTS
404264396	DISPOSAL MANIFESTS
404264397	DISPOSAL MANIFESTS
404264398	DISPOSAL MANIFESTS
404264399	DISPOSAL MANIFESTS
404264400	DISPOSAL MANIFESTS
404264401	DISPOSAL MANIFESTS
404264402	DISPOSAL MANIFESTS
404264403	DISPOSAL MANIFESTS
404264404	DISPOSAL MANIFESTS
404264408	LABORATORY ANALYTICAL REPORT
404264409	LABORATORY ANALYTICAL REPORT
404264410	LABORATORY ANALYTICAL REPORT

404264411	LABORATORY ANALYTICAL REPORT
404264412	SOIL SAMPLE LOCATION MAP
404264413	SOIL SAMPLE LOCATION MAP
404264414	MAP
404264415	LABORATORY ANALYTICAL REPORT
404264442	PHOTO DOCUMENTATION

Total Attach: 28 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC added Spill Facility ID 488360 to Related Facilities	03/13/2026

Total: 1 comment(s)