

State of Colorado  
Energy & Carbon Management Commission

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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 Phone: <u>(303) 894-2100</u> Mobile: <u>(303) 905-5341</u>
Address: <u>PO BOX 188</u>		
City: <u>DEER TRAIL</u>	State: <u>CO</u>	Zip: <u>80135</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 #: 41635 Initial Form 27 Document #: 404231130

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>475501</u>	API #: _____	County Name: <u>ADAMS</u>
Facility Name: <u>FARM RANCH EXPLORATION-62S64W 28NESE (OWP)</u>		Latitude: <u>39.841240</u>	Longitude: <u>-104.548105</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>28</u>	Twp: <u>2S</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Rangeland, cropland  
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? No

**Other Potential Receptors within 1/4 mile**

There are no DWR Permitted water wells plotted within 1/4 mile. The depth to groundwater is estimated to be >100 ft bgs based on a review of other DWR permitted water wells in the area. An unnamed intermittent drainage lies ~1445 ft NE and is tributary to West Sand Creek. There are NWI mapped riverine wetlands located parallel to the drainage. There are no CPW mapped high priority habitats (HPH) or residential building units (RBU) located within 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	VISUALLY, 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 ECMC Orphaned Well Program (OWP). This Form 27 Supplemental presents results from site investigation activities performed during decommissioning of Oil and Gas Facilities, specifically field screening and sampling activities during tank battery decommissioning and on-location flowline/ off-location flowline removal. Soils were observed and field screened for evidence of E&P Waste impacts. Soil samples were collected beneath each key piece of equipment [e.g. aboveground storage tanks (AST) and the separators]. Flowlines were removed. Soil samples were collected from areas where E&P Waste impacts are most likely to have occurred. Samples were submitted to an accredited environmental laboratory for analysis of full Table 915-1 parameters. 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, soil suitability for reclamation).

**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 2

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 11250

### NA / ND

-- Highest concentration of TPH (mg/kg) 135

-- Highest concentration of SAR 19.7

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

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?

Site-specific background samples were not collected as part of this investigation. Area background soil samples were collected during this phase of work, including background sample, BG02, collected at the Farm Ranch Exploration #1,#2,#3 shared tank battery located ~1 mile ESE. Site-specific background samples will be collected during a future OWP phase of work from undisturbed areas with similar soil characteristics and away from historic oil and gas facilities. Background soil samples will be analyzed for 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 define the lateral and vertical extent of E&P Waste impacted soils. Results for arsenic (3.89 mg/kg, 3.98 mg/kg, 4.19 mg/kg) were reported above Table 915-1 Residential soil screening levels (SSL) in all three samples. Results for barium (158 mg/kg, 173 mg/kg, 191 mg/kg) were reported above the Table 915-1 Protection of Groundwater SSL in the three soil samples. Soil pH (8.54 s.u.) was reported above the Table 915-1 soil suitability for reclamation pH upper level of 8.3 s.u. in soil sample, SS02 collected at 1.5 ft bgs beneath the south AST. Sodium adsorption ratio (SAR) (8.29, 9.48, 19.7) was reported above the Table 915-1 SAR soil suitability for reclamation parameter level of < 6 in all three soil samples. Boron was reported at 11.7 mg/L in soil sample SS02 which is above the Table 915-1 boron soil suitability for reclamation level of 2.0 mg/L. Concentrations of TPH were not detected at or above the laboratory reporting limits in soil samples SS01 and SS02. TPH was reported in soil sample SS03 at 134.9 mg/kg, which is less than the Table 915-1 TPH concentration of 500 mg/kg. Concentrations of benzene, toluene, ethylbenzene, xylenes (BTEX); 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, and polycyclic aromatic hydrocarbons (PAH) compounds were not detected at or above their respective laboratory reporting limits.

## 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

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

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ 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

A Form 27 Supplemental will be submitted within 90 days from the date the results are received.

### 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.

This former Behrens Resources Inc. oil and gas facility is in the ECMC Orphaned Well Program. The former Operator's bond(s) and other funding will be used to decommission, investigate, remediate, and reclaim the Location.

Operator anticipates the remaining cost for this project to be: \$ 40000 \_\_\_\_\_

## 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 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 scope 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). 06/05/2025

Proposed site investigation commencement. 09/11/2025

Proposed completion of site investigation. 09/11/2026

### 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 BEHRENS RESOURCES LLC - 10695 FARM RANCH EXPLORATION #6 Tank Battery, FARM RANCH EXPLORATION-62S64W 28NESE, Location ID #475501, served the Farm Ranch Exploration #6 (OWP) oil and gas well (API #05-001-07957). This Form 27 Supplemental presents results for soil samples collected following decommissioning of the tank battery. Soil samples were collected beneath the heater treater/separator (Sample ID: SS01), the south aboveground storage tank (AST) (Sample ID: SS02), and the north AST (Sample ID: S003) at a depth of 1.5 ft bgs. Results for arsenic (3.89 mg/kg, 3.98 mg/kg, 4.19 mg/kg) were reported above Table 915-1 Residential soil screening levels (SSL) in all three samples. Results for barium (158 mg/kg, 173 mg/kg, 191 mg/kg) were reported above the Table 915-1 Protection of Groundwater SSL in the three soil samples. Soil pH (8.54 s.u.) was reported above the Table 915-1 soil suitability for reclamation pH upper level of 8.3 s.u. in soil sample, SS02 collected at 1.5 ft bgs beneath the south AST. Sodium adsorption ratio (SAR) (8.29, 9.48, 19.7) was reported above the Table 915-1 SAR soil suitability for reclamation parameter level of < 6 in all three soil samples. Boron was reported at 11.7 mg/L in soil sample SS02 which is above the Table 915-1 boron soil suitability for reclamation level of 2.0 mg/L. Concentrations of TPH were not detected at or above the laboratory reporting limits in soil samples SS01 and SS02. TPH was reported in soil sample SS03 at 134.9 mg/kg, which is less than the Table 915-1 TPH concentration of 500 mg/kg. Concentrations of benzene, toluene, ethylbenzene, xylenes (BTEX); 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, and polycyclic aromatic hydrocarbons (PAH) compounds were not detected at or above their respective laboratory reporting limits. Site-specific background samples were not collected as part of this investigation. Area background soil samples were collected during this phase of work, including background sample, BG02, collected at the Farm Ranch Exploration #1,#2,#3 shared tank battery located ~1 mile ESE. Site-specific background samples will be collected during a future OWP phase of work from undisturbed areas with similar soil characteristics and away from historic oil and gas facilities. Background soil samples will be analyzed for Table 915-1 metals and soil suitability for reclamation parameters. Further site investigation is required to define the lateral and vertical extent of E&P Waste impacted soils. Site investigation and remediation will proceed under Remediation Project #41635.

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: 12/30/2025

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: 03/17/2026

Remediation Project Number: 41635

**COA Type****Description**

	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.
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.

<b>Att Doc Num</b>	<b>Name</b>
404437544	FORM 27-SUPPLEMENTAL-SUBMITTED
404463849	SITE INVESTIGATION REPORT
404463850	ANALYTICAL DATA SUMMARY TABLE(S)
404463853	SOIL SAMPLE LOCATION MAP
404463854	PHOTO DOCUMENTATION
404463855	ANALYTICAL RESULTS
404463857	ANALYTICAL RESULTS
404463858	ANALYTICAL DATA SUMMARY TABLE(S)
404463860	SOIL SAMPLE LOCATION MAP
404464304	CORRESPONDENCE
404464306	DISPOSAL MANIFESTS
404488665	CORRESPONDENCE
404488666	DISPOSAL MANIFESTS
404488674	DISPOSAL MANIFESTS

Total Attach: 14 Files

## General Comments

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

Total: 0 comment(s)