

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
KRIS NEIDEL

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>WESCO OPERATING INC</u>	Operator No: <u>95520</u>	Phone Numbers Phone: <u>(307) 5775329</u> Mobile: <u>()</u>
Address: <u>120 S DURBIN STREET</u>		
City: <u>CASPER</u>	State: <u>WY</u>	Zip: <u>82602</u>
Contact Person: <u>Dave Weinert</u>	Email: <u>davew@kirkwoodcompanies.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29152 Initial Form 27 Document #: 403247153

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>312871</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>MAUDLIN GULCH-64N95W 35SWNE</u>	Latitude: <u>40.274748</u>	Longitude: <u>-108.015271</u>	
** correct Lat/Long if needed: Latitude: <u>40.274760</u>		Longitude: <u>-108.015377</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>35</u>	Twp: <u>4N</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use grazing
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

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) crude oil and produced water contaminated soils

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	soils	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.

See this Form 27 - Related Forms tab - list of documents for information on previous environmental work completed during this closure process.

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):

See previously submitted Form 27's for previously proposed sampling work. No additional sampling work is proposed under this Form 27.

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 9

-- Highest concentration of TPH (mg/kg) 5980

Number of soil samples exceeding 915-1 9

-- Highest concentration of SAR 12.93

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

BTEX > 915-1 No

Approximate areal extent (square feet) 500

Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

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

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

One background soil sample was collected for this site in August 2023, analytical results are attached. A second background sample was collected in May, 2025. The results of the soil analysis are summarized in the attached table. The May, 2025 analysis are attached.

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.

Soil excavation was completed in 2023. Approximately 24 cubic yards of soil was excavated around the wellhead and disposed of. The disposal manifests are attached.

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.

There are no plans for additional remediation.

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Yes Excavate and offsite disposal

 Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 24

 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.

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.

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

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:

none

Volume of E&P Waste (solid) in cubic yards _____ 24

E&P waste (solid) description crude oil and produced water
contaminated soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Rio Blanco County - Wray Gulch
landfill

Volume of E&P Waste (liquid) in barrels _____ 0

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? No

Does the previous reply indicate consideration of background concentrations? _____

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 landowner has requested this location be left as is. The electric line will be removed and the flow line abandoned in place in accordance with COGCC requirements. A detailed reclamation plan is provided in the attached 915b report.

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. _____

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). 12/15/2022

Proposed site investigation commencement. 05/01/2025

Proposed completion of site investigation. 12/31/2025

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

This Form 27 is a request to close this remediation number based on the results of the soil analysis and leaving elevated inorganics in place via a 915b request. This Form 27 is submitted only for the well location. A separate Form 27 detailing the off location flowline sampling will be submitted.

See this Form 27 - Related Forms tab - list of documents for information on previous environmental work completed during this closure process.

In May, 2025 Wesco contracted a local backhoe operator to excavate four potholes around the wellhead. WSP staff, working on behalf of Wesco collected four confirmation soil samples on and around the wellhead. In total four confirmation soil samples were collected on and around the site. The samples were collected from around the wellhead; one in each cardinal direction from the wellhead at the base of each pothole. Additionally, one background sample was collected approximately 360 ft north of the Site in native material to evaluate naturally occurring background soil concentrations. A photo log completed by WSP staff illustrating the soil sampling activities is provided in Enclosure A. Sample location maps are attached. The sampling activities completed at the Site are summarized below.

WSP personnel performed the confirmation soil sampling at four different locations as described above using a decontaminated hand auger. Auger depths during this sampling at the Site ranged from 7'8" to 9' below ground surface (bgs), and the background sample was collected off Site at a depth of 8". All samples were sealed in Ziplock® bags and were inspected for staining and hydrocarbon odor using visual and olfactory senses. A photoionization detector (PID) was used to field screen the headspaces of samples for detectable volatile organic compounds (VOCs) in parts per million (ppm). The PID readings for the samples ranged from 0.0 ppm to 41.1 ppm. The samples were then placed into laboratory-prepared containers, packed on ice and shipped to Elevation Diagnostics Laboratory (Elevation) in Aurora, Colorado for laboratory analysis. The samples were analyzed for the full ECMC Table 915-1 RSSLCs suite as approved in Form 27 DN 404166188.

The soil analysis results indicate that the samples collected meet Table 915 standards except for Arsenic and SAR. Based on the results, Wesco is requesting closure of the remediation number with the elevated Arsenic and SAR left in place. A 915b report is attached in support of the request.

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

Signed: Dave Weinert

Title: HSE Coordinator

Submit Date: 02/26/2026

Email: davew@kirkwoodcompanies.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: KRIS NEIDEL

Date: 04/01/2026

Remediation Project Number: 29152

COA Type

Description

	Based on review of information presented it appears that no further action is necessary at this time for location abandonment requirements other than reclamation COA's mentioned here. 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 at the site.
	As to any future remedial efforts requiring excavation: topsoil salvage, soil segregation and protection of soils shall be performed in accordance with Rule 1002.b and 1002.c.
	Any work to be done in a manner that does not comport with ECMC rules requires a variance pursuant to Rules 502 and 510. Approval of this 915.b request is based on the current reclamation plan provided. It is noted that the plan does not comport with ECMC 1004 Final Reclamation requirements, however Operator states that a 502 variance for Reclamation will be submitted. In the event that the variance request is not approved by the Commission, this reclamation plan will require updating and submitted to ECMC Reclamation Staff for review.
	In the event table 915-1 exceedances of EC, SAR, or pH boron remain, Operator's 915.b request to leave impacts in situ, and covered with a minimum of 7.5 feet of soil is approved.
	Approval/Passing of this Form is not an endorsement of the reclamation plan that has been attached/included; Location will need to meet 1000 series requirements in order to pass reclamation. If it is determined that reclamation is not progressing towards 1000 series standards, additional remedial efforts may be required; the reclamation plan should be updated based on the site's conditions, and implemented in order to ensure standards are met.

5 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
404528318	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404534959	ANALYTICAL RESULTS
404534972	PHOTO DOCUMENTATION
404534983	DISPOSAL MANIFESTS
404555098	MAP
404556321	ANALYTICAL DATA SUMMARY TABLE(S)
404558128	MAP
404558902	OTHER
404601522	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

General Comments

User Group	Comment	Comment Date
Reclamation Specialist	Operator has not provided any references or sources of root depth information.	03/03/2026
Reclamation Specialist	Cut-slope areas on the Location have not been identified within figures as “areas to be reclaimed” and appear bare. In the event that a variance request waiving contouring requirements is submitted and approved by the Commission, 1004 revegetation requirements will remain applicable at the slopes. Additionally, Slope stabilization requirements pursuant to 1002.f also remain applicable until long-term stabilization has been achieved.	03/03/2026
Reclamation Specialist	Reference areas identified in section 1.2 of the Reclamation plan is not an appropriate reference for Reclamation.	03/03/2026
Reclamation Specialist	Operator does not appear to have vertically delineated the extent of impacts beyond 8.5'. However, based on the information outlined above, Staff do not believe that the elevation of the buried materials containing 915-1 Inorganic exceedances would impact groundwater, and is beyond the root zones for the species identified within the Reclamation Plan.	03/03/2026
Reclamation Specialist	Operator comments within section 2.5 stated “the area to be seeded will be de-compacted by cross ripping to one foot deep.....compacted areas will be cross ripped to 18-24 inches....” Pursuant to ECMC requirements, compaction alleviation will be performed at a minimum of 18 inches.	03/03/2026

Total: 5 comment(s)