

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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404315223
Receive Date:
08/18/2025
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) 577-5329</u> Mobile: <u>(307) 259-0230</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 #: 40823 Initial Form 27 Document #: 403965897

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>312846</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>MAUDLIN GULCH UNIT-64N95W 27SWNE</u>		Latitude: <u>40.288888</u>	Longitude: <u>-108.037312</u>
		** correct Lat/Long if needed: Latitude: <u>40.289104</u>	Longitude: <u>-108.037216</u>
QtrQtr: <u>SWNE</u>	Sec: <u>27</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? No
Is groundwater less than 20 feet below ground surface? No

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> E&P Waste | <input checked="" 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 checked="" type="checkbox"/> Other (as described by EPA) | crude oil and produced water contaminated soil - if encountered & sampling waste |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	TBD	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.

Between 6/23/2025 and 7/23/2025, two site assessments and remediation events were conducted. In order to save space within the form for transparency of proposed next steps, the details of these assessments have been moved entirely to the attached report which includes multiple summaries, figures, tables, and photos.

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):

In order to delineate the impacts associate with the plugging and abandonment of the Maudlin Gulch #4 wellhead and flow line, Wesco will collect a minimum of 6 confirmation soil samples. One base confirmation soil sample will be collected from the base of the expanded excavation footprint immediately adjacent to the cut and capped well. One sample will be collected from each of the four sidewalls of the open wellhead excavation and below the flowline from the north excavation wall. One five-point composite confirmation sample will be collected from stockpiled material associated with the expanded excavation. The five-point aliquot will be thoroughly mixed prior to field screening and jarring.

Continued in "Operators comments" section.

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):

SAMPLE SUMMARY

Soil

Number of soil samples collected 12
Number of soil samples exceeding 915-1 12
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 310

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 9

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?

One site-specific background soil sample was collected on June 25, 2025, 2025 from surrounding undisturbed, native lands. The sample was collected via hand auger at a depths of 8 in below ground surface (bgs). The site-specific background soil sample was submitted for laboratory analysis of ECMC Table 915-1 constituents.

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?

Please see the "Proposed Soil Sampling" Section above for details.

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.

There is currently no source identified, impacted material discovered during the proposed site investigation it will be properly disposed of.

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.

Once the impacts have been delineated, a remediation plan will be developed and then presented in a future Form 27. Impacted soils will likely be removed and transported offsite for disposal under appropriate manifest.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

Chemical oxidation
 Air sparge / Soil vapor extraction
 Natural Attenuation
 Other _____

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.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

Request Alternative Reporting Schedule:

Semi-Annually Annually Other Wesco requests the director to consider a semi-annual reporting schedule due to winter weather impacting site accessibility.

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.

Wesco Operating, Inc. has complied with General Liability Insurance requirements 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? _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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 well location is on BLM surface. Reclamation will be completed according to BLM requirements.

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/01/2025

Proposed site investigation commencement. 04/01/2025

Proposed completion of site investigation. 12/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/25/2025

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

Based on the analytical data provided in the attached ROWC, and comparing the confirmation soil samples taken at the Site to twelve other background collected in Maudlin Gulch, WSP believes that the arsenic exceedances in all confirmation soil samples are not related to oil and gas operations at the Maudlin Gulch Unit #4 location. Twelve background samples collected in the Maudlin Gulch field within a 1.6-mile radius of the Site all indicated elevated arsenic levels ranging from 3.35 mg/kg to 8.25 mg/kg which are all above the ECMC Table 915-1 concentration level limit of 0.68 mg/kg. The highest observed arsenic value at the from the Site was 7.54 mg/kg which is below the highest background concentration in the area. See Figure 3 or the attached ROWC for a map of all background soil sample locations and Table 2 for a full and comprehensive list of all background soil analytical results taken in the Maudlin Gulch field. Based on these findings, WSP recommends that Wesco request the Director for the removal of arsenic as a contaminant of concern for the Site.

Regarding the exceedances of TPH, 1-methylnaphthalene, naphthalene, and pH, in confirmation soil samples, WSP recommends continued advancement of the excavation to remove contaminated material and to determine the vertical and horizontal extent of the impacts. All Table 915 exceedances for 1-methylnaphthalene and naphthalene were removed during the subsequent excavation on July 23, 2025 and added to the stockpile. The remaining exceedances from the excavation base and walls include pH and TPH. Therefore, prior to additional source removal, WSP recommends that Wesco request the ECMC Director for a reduced sampling suite of TPH and pH only.

WSP also recommends that the stockpile on location be removed once confirmation samples from the excavation meet Table 915-a RSSLCs and disposed of accordingly under waste manifest at an appropriate facility

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

Signed: Parker Coit

Title: PG

Submit Date: 08/18/2025

Email: Parker.coit@wsp.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: 40823

COA Type

Description

	Disposal manifest shall be included on a supplemental report.
	Per Rule 915.e.(2).C.the modified list of contaminants of concern is approved as requested with the addition of Naphthalene and 1-methylnaphthalene.
	TPH exceedances have not been delineated at the wellhead. Request for additional excavation and sampling is approved.
3 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

404315223	FORM 27-SUPPLEMENTAL-SUBMITTED
404315314	ANALYTICAL RESULTS
404315315	ANALYTICAL RESULTS
404319951	SITE INVESTIGATION REPORT

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)