

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
RICK ALLISON

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 ECOM 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>MAGPIE OPERATING INC</u>	Operator No: <u>52530</u>	Phone Numbers
Address: <u>2707 SOUTH COUNTY RD 11</u>		Phone: <u>(970) 669-6308</u>
City: <u>LOVELAND</u> State: <u>CO</u> Zip: <u>80537</u>		Mobile: <u>()</u>
Contact Person: <u>Seyma Yilmaz</u>	Email: <u>syilmaz@magpieoperating.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 42705 Initial Form 27 Document #: 404348144

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>WELL</u>	Facility ID: _____	API #: <u>069-05066</u>	County Name: <u>LARIMER</u>
Facility Name: <u>IVERS, DOROTHY 1-B</u>	Latitude: <u>40.376096</u>	Longitude: <u>-105.037739</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>29</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>307052</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>IVERS, DOROTHY-65N68W 29NWNW</u>	Latitude: <u>40.376123</u>	Longitude: <u>-105.037840</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>29</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>492619</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>Ivers-Dorothy 1-B</u>	Latitude: <u>40.376096</u>	Longitude: <u>-105.037739</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>29</u>	Twp: <u>5N</u>	Range: <u>68W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>492620</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>Ivers-Dorothy 1-B Tank Battery</u>	Latitude: <u>40.376659</u>	Longitude: <u>-105.040510</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>30</u>	Twp: <u>5N</u>	Range: <u>68W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Cropland

Is domestic water well within 1/4 mile? Yes 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

Nearest water well ~1035-ft Northwest, Permit No.66699-; Residential well was constructed, depth to water 35-ft.
 The wellhead location is not within HPH. The Bald Eagle Active Nest Site Half Mile buffer is within 1/4 mile from the wellhead location.
 The Tank Battery is within Bald Eagle Active Nest Site Half Mile buffer.
 Nearest RBU's: 595' NE, 566' N, 450' NW, 1220' W.

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
No	GROUNDWATER	TBD	Lab analysis
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 Ivers-Dorothy #1 was decommissioned per ECOM 911.a. Initial site assessment began on 12/17/2025 at the wellhead and 12/18/2025 at the Tank Battery on 12/18/2025; olfactory observations and PID field screening indicated there may be historical impacts may be present.

Off-Location Flowline assessment was conducted on 12/18/2025; a soil sample was collected at FL-03 @ 1' and analytical results show that EC and SAR exceed local background levels. PID Field Screening along the off-location flowline indicate there were no impacts.

Soil Samples were collected at the Tank Battery/Separator on 1/16/2026. Analytical results show that Benzene exceeds GWSSL at SEP-01. TB-01 exceeds pH and SAR local background levels.

Excavation at the wellhead was conducted from 1/19/2026-1/23/2026; soil samples were collected 2/2/2026. Analytical results show that EX-E-01 exceeds TPH, 1,2,4-TMB, pH and SAR.

A groundwater grab sample was collected from the wellhead excavation area on 2/2/2026; analytical show that are no impacts. Background water samples were collected from 2 locations.

Background soil samples were collected from 3 locations. Analytical results show the local background levels for EC is 11.8, pH is 8.44, SAR is 17.65; Local Clean-Up Levels for Arsenic is 8.175 mg/kg (1.25 * 6.54 mg/kg), Barium is 280.3375 mg/kg (1.25 * 224.27 mg/kg), Hexavalent Chromium is 0.2125 mg/kg (1.25 * 0.17 mg/kg), Lead is 23.075 mg/kg (1.25 * 18.46 mg/kg), and Selenium is 4.3625 mg/kg (1.25 * 3.49 mg/kg).

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):

The Tank Battery/Separator is within Bald Eagle Active Nest Site Half Mile buffer. Delineation samples will be conducted to determine the extents of impacts prior to excavation being conducted; consultation with CPW will be conducted prior to excavation.

Excavation will be conducted around EX-E-01; confirmation samples will be collected.

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

Number of soil samples collected 27

Number of soil samples exceeding 915-1 27

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

Approximate areal extent (square feet) 1825

NA / ND

-- Highest concentration of TPH (mg/kg) 1655.64

-- Highest concentration of SAR 25.27

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 5

Groundwater

Number of groundwater samples collected 3

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 4

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

-- Highest concentration of Toluene (µg/l) 3.62

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

ND 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?

Background soil samples were collected from 3 locations. Analytical results show the local background levels for EC is 11.8, pH is 8.44, SAR is 17.65; Local Clean-Up Levels for Arsenic is 8.175 mg/kg (1.25 * 6.54 mg/kg), Barium is 280.3375 mg/kg (1.25 * 224.27 mg/kg), Hexavalent Chromium is 0.2125 mg/kg (1.25 * 0.17 mg/kg), Lead is 23.075 mg/kg (1.25 * 18.46 mg/kg), and Selenium is 4.3625 mg/kg (1.25 * 3.49 mg/kg).

2 background water samples were collected from 2 locations.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 229

Volume of liquid waste (barrels) 0

Is further site investigation required?

The Tank Battery/Separator is within Bald Eagle Active Nest Site Half Mile buffer. Delineation samples will be conducted to determine the extents of impacts prior to excavation being conducted.

Excavation will be conducted around EX-E-01; confirmation samples will be collected.

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.

Impacted soils will be excavated and properly disposed of at Pawnee Waste.

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.

Impacted soils will be excavated and properly disposed of at Pawnee Waste.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 229

_____ 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.

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 or 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. 10/01/2026

Proposed date of completion of Reclamation. 10/01/2028

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. 12/18/2025

Actual Spill or Release date, or date of discovery. 12/17/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/01/2026

Proposed site investigation commencement. 03/01/2026

Proposed completion of site investigation. 09/01/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/19/2026

Proposed date of completion of Remediation. 08/31/2026

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

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

Signed: Amber Barnett

Title: Compliance Specialist

Submit Date: 04/14/2026

Email: abarnett@ardorenvironmental.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: RICK ALLISON

Date: 04/17/2026

Remediation Project Number: 42705

COA Type**Description**

	Continue to analyze soil samples for all Table 915-1 Contaminants of Concern.
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.

Att Doc Num**Name**

404549605	FORM 27-SUPPLEMENTAL-SUBMITTED
404550027	ANALYTICAL DATA SUMMARY TABLE(S)
404550182	ANALYTICAL RESULTS
404550184	ANALYTICAL RESULTS
404550187	ANALYTICAL RESULTS
404550189	ANALYTICAL RESULTS
404550192	DISPOSAL MANIFESTS
404550278	PHOTO DOCUMENTATION
404619368	SOIL SAMPLE LOCATION MAP

Total Attach: 9 Files

General Comments**User Group****Comment****Comment Date**

Environmental	returned to draft: include site figures, soil sample location figures, and excavation boundary site maps	04/14/2026
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Total: 1 comment(s)