

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404535867  
Receive Date:  
03/02/2026

Report taken by:  
KRIS NEIDEL

Site Investigation and Remediation Workplan (Initial 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 #: 45059 Initial Form 27 Document #: 404535867

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>PIT</u>	Facility ID: <u>116693</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>MAUDLIN GULCH</u>	Latitude: <u>40.286975</u>	Longitude: <u>-108.025220</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSW</u>	Sec: <u>26</u>	Twp: <u>4N</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>PIT</u>	Facility ID: <u>116712</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>MAUDLIN GULCH BATTERY</u>	Latitude: <u>40.288998</u>	Longitude: <u>-108.025882</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>26</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 ML

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? Yes

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

[Empty box for other potential receptors]

**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 soil
- pit liner, culverts, T siphons, associated equipment

**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	unknown	will by soil 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.

Previous excavation, sampling work and other remediation work has been completed in and around these (2) emergency pits. For the purpose of the work described in this closure request, no initial action has been completed yet.

**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 ):

Four grab samples will be collected from the pits as shown on the attached map. Each sample will be collected at 12 inches below soil surface. The samples will be analyzed for ECMC table 915 constituents.

**Proposed Groundwater Sampling**

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

[Empty box for groundwater sampling details]

**Proposed Surface Water Sampling**

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

[Empty box for surface water sampling details]

**Additional Investigative Actions**

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

[Empty box for additional investigative actions]

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected     0      
Number of soil samples exceeding 915-1       
Was the areal and vertical extent of soil contamination delineated?       
Approximate areal extent (square feet)     

### NA / ND

     Highest concentration of TPH (mg/kg)       
     Highest concentration of SAR       
     BTEX > 915-1       
     Vertical Extent > 915-1 (in feet)     

### 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?

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

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If impacted soil is encountered, the source removal method will be determined at that time.

### 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.

Numerous documents have been submitted to the ECMC describing and providing the results of soil, surface water and ground water analysis and remediation work in and around the pits. A few of these are listed in the Related Forms tab of this document. There is an ongoing remediation project (remediation #10268) at the tank battery that includes the southeast corner of the south pit and included installation of a liner in the south pit. Since no sampling has been completed under this specific Form 27, no impacts have been identified under this proposed sampling plan.

### Soil Remediation Summary

In Situ  Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Excavate and offsite disposal  
\_\_\_\_\_ 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.

# 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? \_\_\_\_\_

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: \_\_\_\_\_

# 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 fence around both pits will be removed. The liner and underlying vent pipe will be removed from the south pit. The T siphons and associated culverts located on each pit will be removed. The culvert between the south and north pits will be removed. The access stairway at the south end of the north pit will be removed. The culvert connecting the former tank containment area to the south end of the south pit will be filled and capped at both ends or removed. The surface will be contoured to match the existing surrounding surface. A landowner and BLM approved seed mix will be used for seeding. The seed mix is attached.

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? Yes

## SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 04/30/2026

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). \_\_\_\_\_

Proposed site investigation commencement. 04/30/2026

Proposed completion of site investigation. \_\_\_\_\_

### 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**

There are two emergency pits (south pit and north pit) located immediately north of the former Maudlin Gulch tank battery. See also location ID#116693 for additional information. This Form 27 is submitted to provide a sampling plan in order to obtain closure of those pits and obtain approval for the planned reclamation of the pits. These pits were formerly used by Wesco as part of the tank battery containment facilities. The tank battery is in the process of being decommissioned, sampled and reclaimed. All the production equipment has been removed. The landowner has requested the pits be removed.

Numerous documents have been submitted to the ECMC describing and providing the results of soil, surface water and ground water analysis, soil excavation and other remediation work in and around the pits. A few of these are listed in the Related Forms tab of this document. There is an ongoing remediation project (remediation #10268) at the tank battery that includes the southeast corner of the south pit and included installation of a liner in the south pit.

For the Site Investigation Tab of this form, Wesco has listed all sample numbers as 0 even though previous work has included collection of soil samples, surface water samples and groundwater samples in and near these pits. This has been done so that the sampling and closure work proposed under this Form 27 is viewed as a stand alone closure request. The same has been done for the Remedial Action Plan and Remedial Progress Update tabs of this form for the same reason.

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: 03/02/2026

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: 05/06/2026

Remediation Project Number: 45059

**COA Type****Description**

	Wesco shall ensure that stormwater from the former tank battery is allowed to enter the pit(s). All areas of decommissioning shall comply with 1002.f stormwater rules.
	Request to remove liner is approved. Pit liner shall be disposed per 911.c(3).
	It is understood that the pits will be "removed". At the time of request for approval of 915-1 samples, additional information how the pits will be removed shall be provided (backfilled, regraded, etc)
	Sampling for each pit shall be as follows; (2)-Full 915-1 samples from the pit bottom and (2) from each pit wall for Table 915-1 for TPH and BTEX.  During the regrading of the pit area, careful attention shall be made looking for signs of impacted soil. If impacted soil is discovered, samples shall be collected for Table 915-1.  If impacts are discovered, full delineation will be required.
	Seed Mix documents were provided. Approval of this form does not include review or Reclamation planning.  Contact ECMC Reclamation group as necessary.  Surface disturbances shall be reclaimed in accordance with the 1000 Series Reclamation Regulations.

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**

404535867	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
404535923	OTHER
404539119	MAP

Total Attach: 4 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Each pit is roughly 125'x75'. The proposed sample schedule of 2 samples per pit is not adequate for this size of a pit. See COA for approved sample schedule.	05/06/2026

Total: 1 comment(s)