

# State of Colorado Oil and Gas Conservation 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 COGCC 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

### OPERATOR INFORMATION

|   |   |                             |
|---|---|-----------------------------|
| Name of Operator: <u>FOUNDATION ENERGY MANAGEMENT LLC</u> | Operator No: <u>10112</u>                 | <b>Phone Numbers</b>        |
| Address: <u>5057 KELLER SPRINGS RD STE 650</u>            |   | Phone: <u>(303) 2448114</u> |
| City: <u>ADDISON</u>                                      | State: <u>TX</u>                          | Zip: <u>75001</u>           |
| Contact Person: <u>Alyssa Beard</u>                       | Email: <u>abeard@foundationenergy.com</u> | Mobile: <u>( )</u>          |

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 15761Initial Form 27 Document #: 402417844

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water                   |
| <input checked="" type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure                  | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                            | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project                                  |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste                      | <input type="checkbox"/> Rule 906.c.: Director request   |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____   |

#### SITE INFORMATION

N Multiple Facilities ( in accordance with Rule 909.c. )

|  |                            |  |                               |
|--|----------------------------|--|-------------------------------|
| Facility Type: <u>PIT</u>              | Facility ID: <u>111692</u> | API #: _____                                   | County Name: <u>JACKSON</u>   |
| Facility Name: <u>TITANIUM 26-10-7</u> |                            | Latitude: <u>40.547189</u>                     | Longitude: <u>-106.449038</u> |
|  |                            | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____              |
| QtrQtr: <u>NWSE</u>                    | Sec: <u>26</u>             | Twp: <u>7N</u>                                 | Range: <u>81W</u>             |
|  |                            | Meridian: <u>6</u>                             | Sensitive Area? <u>Yes</u>    |

#### SITE CONDITIONS

General soil type - USCS Classifications OLMost Sensitive Adjacent Land Use Non-crop federal rangelandIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? Yes

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

There is a pond approximately 0.11 miles from the pit.

# 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               |
|-----------|----------------|------------------|------------------------------|
| Yes       | SOILS          | TBD              | Field screening and 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.

Initial actions and completed remedial measures have previously been submitted to the COGCC in the Form 19 Initial and Supplemental documents and in the Form 27 Initial (Document# 402417844). The COGCC assigned spill tracking facility ID #111692 and remediation number #15761 for the Site. Investigative activities were completed on December 2, 2020. Soil samples were collected from five locations within the former produced water vessel and pit area. A shale layer approximately 1-foot thick was encountered during the excavation test pit activities around nine feet below ground surface and competent bedrock was encountered below the shale. Lab results confirmed soil was above COGCC standards for TPH in two locations. Groundwater was not encountered during excavation activities and following delineation of the soils, the test pit was backfilled to existing grade and further investigative activities are being coordinated. Details of the December 2020 soil delineation and investigation is provided withing this Form 27 submittal.impact.

## 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 ):

During the 12/2/20 pit closure investigation, five soil samples were collected utilizing equipment onsite and two samples were collected from the base of the former produced water vessel and three samples were collected from the base of the test pits along the length of the former pit area (Figure 2). The samples at the water vessel were analyzed for full Table 910-1, and the test pit samples were analyzed for BTEX and TPH (GRO & DRO) by Summit Scientific and the results are presented in Table 1 and illustrated on Figure 2. Two samples were reported above the Table 910 standard for TPH and based on field observations, further excavation and delineation activities may be needed at the Site to address impacted material. A work plan will be presented to the COGCC for approval and during these activities, soils will be delineated to confirm the extent of further potential impacts on Site. Soil samples will be collected and submitted for laboratory analysis.

### Proposed Groundwater Sampling

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

Groundwater was not encountered at the Site and sampling is not anticipated at this time.

### 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 ):

Based on field observations, further excavation and delineation activities may be needed at the Site to address impacted material. A work plan will be presented to the COGCC for approval and during these activities, soils will be delineated to confirm the extent of further potential impacts on Site. Soil samples will be collected and submitted for laboratory analysis.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 5  
Number of soil samples exceeding 910-1 2  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 2550

### NA / ND

-- Highest concentration of TPH (mg/kg) 2410  
-- Highest concentration of SAR 13.9  
BTEX > 910-1 No  
Vertical Extent > 910-1 (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) 0'  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)           
NA Highest concentration of Toluene (µg/l)           
NA Highest concentration of Ethylbenzene (µg/l)           
NA Highest concentration of Xylene (µg/l)           
NA Highest concentration of Methane (mg/l)         

### Surface Water

0 Number of surface water samples collected  
0 Number of surface water samples exceeding 910-1  
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?

Two samples were collected and analyzed for inorganic and metals as part of the Table 910-1 parameters from the presumed depth of the former produced water vessel. An additional background sample will be collected from an undisturbed area off the well pad and analyzed for inorganics and metals during subsequent investigation activities.

☐ 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?

Based on field observations and the recent results, FEM would consider evaluating further investigation and alternative remediation approach to the Site with COGCC approval, which may include, but not limited to the potential use of in-situ or other treatment methods to mitigate the impacted area beneath the surface. Further delineation and remedial activities may be needed to address the extent of impacts at the Site and a workplan will be presented to the COGCC for approval once activities are coordinated.

# 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 exceeding COGCC Table 910-1 standards at the Site and require remediation, will be excavated with a trackhoe until analytical results show that the impacted material has been removed or treated. Once a remediation workplan is coordinated, as much remaining source material will be removed from the Site once conditions allow for access following the winter season and transported to an off-site disposal facility and backfilled to match pre-existing conditions. Impacted soils will be transported to Pawnee Waste in Grover, CO. Confirmation soil samples will be collected to ensure the removal of impacted material.

## 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.

Following the completion of the approved remediation efforts and/or treatment of impacted soils associated with the Site, source material will be removed from the Site and soil samples will be collected from the sidewalls and the base during the excavation activities to confirm the horizontal and vertical extents are below the COGCC soil standards.

## Soil Remediation Summary

### ☐ In Situ

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

### ☐ Ex Situ

\_\_\_\_\_ Excavate and offsite disposal  
\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_  
\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC 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.

Groundwater was not encountered at the site during soil delineation activities and monitoring is not anticipated at this time. If site conditions change, a monitoring program may be warranted.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**Report Type:** ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Soil investigative summary report \_\_\_\_\_

### 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 \_\_\_\_\_

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_

E&P waste (liquid) description \_\_\_\_\_

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No \_\_\_\_\_

Do all soils meet Table 910-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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.

This well was plugged in November 2020 and the entire location will be recontoured and reclaimed in 2021. Once remediation activities are complete, the former pit area will be reclaimed to the present grade of the location or to the approximate original contour of the landscape consistent with the 1000-series rule in accordance with final reclamation of the location.

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 approve the seed mix? \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, if known. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). \_\_\_\_\_

Date of commencement of Site Investigation. 07/27/2020

Date of completion of Site Investigation. 12/02/2020

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 05/03/2021

Date of completion of Remediation. 05/14/2021

### SITE RECLAMATION DATES

Date of commencement of Reclamation. 05/17/2021

Date of completion of Reclamation. 05/28/2021

### OPERATOR COMMENT

Information within this Form 27 is being submitted in association with REM# 15761 in conjunction with the closure of the Titanium 26-10-7 pit (Facility ID 111692). Impacted soil was discovered within the pit at the base depth of approximately 9 feet. Competent bedrock was encountered below a shale layer at the base of the test pit excavations. The bedrock appeared to act as a natural barrier for potential migration. A workplan will be presented to the COGCC for approval once remediation activities are coordinated. Details will be provided on a Supplemental Form 27.

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

Signed: Alyssa Beard

Title: EHSR Manager

Submit Date: 01/08/2021

Email: regulatory@foundationenergy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: KRIS NEIDEL

Date: 03/30/2021

Remediation Project Number: 15761

### COA Type

### Description

|  |  |
|--|--|
|  |  |
|--|--|

### Attachment Check 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

|           |   |
|-----------|---|
| 402565459 | INVESTIGATION/REMEDIALATION WORKPLAN (SUPPLEMENTAL) |
| 402569965 | ANALYTICAL RESULTS                                  |
| 402643706 | FORM 27-SUPPLEMENTAL-SUBMITTED                      |

Total Attach: 3 Files

### General Comments

### User Group

### Comment

### Comment Date

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)