

State of Colorado Oil and Gas Conservation 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 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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>FOUNDATION ENERGY MANAGEMENT LLC</u>	Operator No: <u>10112</u>	Phone Numbers Phone: <u>(303) 244-8114</u> Mobile: <u>()</u>
Address: <u>5057 KELLER SPRINGS RD STE 650</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>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 17540 Initial Form 27 Document #: 402632383

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: Facility Closure - well to be P&A'd

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>330961</u>	API #: <u></u>	County Name: <u>WELD</u>
Facility Name: <u>SHOWERS-67N60W 5NWNW</u>		Latitude: <u>40.608350</u>	Longitude: <u>-104.123994</u>
		** correct Lat/Long if needed: Latitude: <u></u>	Longitude: <u></u>
QtrQtr: <u>NWNW</u>	Sec: <u>5</u>	Twp: <u>7N</u>	Range: <u>60W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

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	SOILS	None	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.

Foundation is planning to document conditions beneath all equipment on the Showers 5-4 location (ID:330961) through observation and field screening when equipment is removed. Based on observations of staining or odor, Foundation will collect a minimum of one (1) soil sample from the area beneath each piece of equipment on location -- 1 wellhead. The off-location flowline runs under WCR 86 to the tank battery and Foundation has requested to leave the line in place. A Form 44 pre-abandonment notice has been submitted and the line will be tested for integrity prior to abandonment in place. Notification of intent to abandon in place was sent to the surface owner and the Weld County LGD. Flowline abandonment will be documented with photographs.

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):

Prior to the wellhead equipment being removed, FEM collected one soil sample was from within 5 feet of the existing wellhead location to determine if surficial impacts (6-12") were present and needed to be addressed. One background sample was also collected from a nearby unimpacted area for comparison. The locations and VOC data are illustrated on Figure 2, presented on Tables 1 and 2, and the final lab report from Summit Scientific laboratory is included as Attachment A. The initial soil sample results at the well head were all below the Table 915-1 standards. Once the wellhead is removed in the summer of 2021, FEM proposes to collect additional confirmation soil samples from the extents of the open excavation. If field screening and visual observations do not indicated impacts, FEM proposes to collect a base sample from the disturbed area for Table 915 parameters.

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):

Since impacts to the soil at the well head were not observed during the initial investigation, FEM does not anticipate collecting additional soil samples from the horizontal extents when the well head is cut and capped, unless a release is observed. FEM plans to collect a base sample from the excavation to confirm the vertical extents and to ensure any potential impacted material is removed and/or not present during these activities. FEM will also use a PID to field screen the soils and determine whether additional soil sampling is needed, and the data will be presented to the COGCC in a subsequent Form 27S. Photo documentation will also be provided to the COGCC of these activities.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 2

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 1.67

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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?

A background sample (Background-WH1 @2') was collected and analyzed for Table 915-1 organics and soil suitability parameters. The results of this background sample are presented on Tables 1 and 2.

☐ 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?

Further investigation will be necessary once the wellhead is removed, cut, and capped to determine if impacts are present in the horizontal and vertical extents of the excavation during these activities. However, FEM does not anticipate impacts to be present at this time based on the initial investigative results provided within this Form 27S. Details of the additional remediation and investigative activities will be provided to the COGCC in a subsequent Form 27S submittal.

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.

Based on the results of this investigation, FEM does not anticipate removing unimpacted soils from the Site. Once the wellhead is cut and capped in 2021 and depending on the visual and laboratory information, additional source removal may not be warranted. If impacted soils are encountered, the soil will be removed for proper off-site disposal, and the lateral and vertical extent of impact will be determined with confirmation sampling and submitted on a Supplemental Form 27.

REMEDIAL 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 soil was not discovered at the wellhead location during the initial May 12, 2021 investigation. Since the final confirmation soil samples have not yet been collected following the removal of onsite infrastructure, Foundation will evaluate the additional data and develop a remediation work plan if necessary and provide the details in a subsequent Form 27S submittal to the COGCC. However, if impacts are present, soil will be removed and disposed off-site. The results of the sampling activities will be submitted on a Supplemental Form 27.

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.

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

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:

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? ☐ Yes

Does the previous reply indicate consideration of background concentrations? ☐ No

Does Groundwater meet Table 915-1 standards? ☐

Is additional groundwater monitoring to be conducted? ☐

Operator shall comply with the COGCC 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.

Since the investigation results indicated that there was no impact to soil, reclamation will be performed in accordance with 1000 series rules once the final soil confirmation results after the removal of the wellhead show concentrations below the Table 915 standards. Foundation will reseed the location with a seed mix approved by the surface owner during the next favorable season, and weed spraying will be utilized for weed prevention until final reclamation has been achieved.

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. 05/10/2021

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. 04/26/2021

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

This Form 27S is being provided to the COGCC as a project status update for remediation project #17540. There were no Table 915-1 exceedances observed during the initial wellhead investigation, and upon approval of this Form 27S, Foundation will commence wellhead removal, photo documentation, additional confirmation soil sampling, and final reclamation of the site. If the results indicate soils are not impacted, FEM will also submit a request for no further action and site closure in a subsequent Form 27S submittal.

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

Signed: Alyssa Beard

Title: EHS Manager

Submit Date: 09/16/2021

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: RICK ALLISON

Date: 10/26/2021

Remediation Project Number: 17540

Condition of Approval**COA Type****Description**

0 COA	

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**

402721399	FORM 27-SUPPLEMENTAL-SUBMITTED
402725923	OTHER
402725938	PHOTO DOCUMENTATION

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)