

# State of Colorado Oil and Gas Conservation Commission

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401257683

Receive Date:

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Report taken by:

CARLOS LUJAN

## 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>16000 DALLAS PARKWAY #875</u>		Phone: <u>(918) 526-5592</u>
City: <u>DALLAS</u>	State: <u>TX</u>	Zip: <u>75248-6607</u>
Contact Person: <u>Rachel Grant</u>	Email: <u>rgrant@foundationenergy.com</u>	Mobile: <u>(918) 638-1153</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9864 Initial Form 27 Document #: 2526999

#### 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 checked="" 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

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

Facility Type: <u>PIT</u>	Facility ID: <u>119463</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>3-9</u>		Latitude: <u>39.380353</u>	Longitude: <u>-108.995788</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NESW</u>	Sec: <u>9</u>	Twp: <u>8S</u>	Range: <u>104W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>PIT</u>	Facility ID: <u>119478</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>FEDERAL 12-3</u>		Latitude: <u>39.395901</u>	Longitude: <u>-108.996066</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWNW</u>	Sec: <u>3</u>	Twp: <u>8S</u>	Range: <u>104W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>PIT</u>	Facility ID: <u>119483</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>FEDERAL 43-4</u>		Latitude: <u>39.394291</u>	Longitude: <u>-108.987031</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NESW</u>	Sec: <u>4</u>	Twp: <u>8S</u>	Range: <u>104W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: PIT		Facility ID: 119489		API #:		County Name: GARFIELD	
Facility Name: FEDERAL 1-34				Latitude: 39.415292		Longitude: -108.973740	
** correct Lat/Long if needed: Latitude:      Longitude:							
QtrQtr: NWNW	Sec: 34	Twp: 7S	Range: 104W	Meridian: 6	Sensitive Area? Yes		

Facility Type: PIT		Facility ID: 119490		API #:		County Name: GARFIELD	
Facility Name: FEDERAL 1-35				Latitude: 39.408850		Longitude: -108.964033	
** correct Lat/Long if needed: Latitude:      Longitude:							
QtrQtr: NWSW	Sec: 35	Twp: 7S	Range: 104W	Meridian: 6	Sensitive Area? Yes		

Facility Type: PIT		Facility ID: 119496		API #:		County Name: GARFIELD	
Facility Name: FEDERAL 3-11				Latitude: 39.380805		Longitude: -108.954361	
** correct Lat/Long if needed: Latitude:      Longitude:							
QtrQtr: NWSE	Sec: 11	Twp: 8S	Range: 104W	Meridian: 6	Sensitive Area? Yes		

### **SITE CONDITIONS**

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

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

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

No receptors have been identified within 1/4-mile of the subject facilities

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input 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 checked="" 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 type="checkbox"/> Other (as described by EPA) |  |

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Max: 15'x15'x8' bgs	Soil sampling & 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.

In September 2016, Foundation Energy Management, LLC (Foundation) completed the transfer of multiple assets from National Fuel Corporation to Foundation. This asset transfer included ten locations with inactive pits, which were determined to serve no current or future purpose related to the operation of the associated wells. The subject pit Facility IDs, associated wells and associated well API numbers were provided in Exhibit E of the Form 10.

Site inspections were conducted by the COGCC in June 2016. Foundation conducted pit assessment activities in December 2016 and selected six of the pits for remediation and closure (Figure 1). Two of the pits can be closed with no further activities, and two require additional assessment activities. Proposed remediation activities are described in the following sections.

### 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 ):

Soil samples were collected from each location and analyzed by Summit Scientific Laboratory in Golden, Colorado, as follows:

- One base sample from each pit: full Table 910-1 soil analytical suite;
- Four sidewall samples from each pit: BTEX, TPH-GRO, TPH-DRO, EC, and pH;
- Three composite background samples (one each) from the northern, southeastern, and southwestern groups of sites: arsenic.

Soil sample results are presented in Table 1 and illustrated on Figures 2 - 7. The laboratory analytical reports are included as an attachment.

#### 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 ):

Assessment of these six locations is complete; remedial activities will be conducted as described herein.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 33

Number of soil samples exceeding 910-1 9

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

Approximate areal extent (square feet) 1111

### NA / ND

-- Highest concentration of TPH (mg/kg) 18500

-- Highest concentration of SAR 26.6

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 8

### 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 910-1

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

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?

Three composite samples were collected and analyzed for arsenic. The background arsenic sample results ranged from 5.60 milligrams per kilogram (mg/kg) to 9.58 mg/kg.

☐ 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

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.

Foundation will remediate identified source material as described in the following section.

## 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.

Impacted soil will be removed from the subject pits and treated with a dilute solution of hydrogen peroxide to mitigate hydrocarbon impacts. Excavation sidewall and base samples will be collected and analyzed for BTEX, TPH-GRO, TPH-DRO, pH, and EC. Composite samples will be collected from treated material at a frequency of 1 per 50 yards of treated material and analyzed for BTEX, TPH-GRO, TPH-DRO, pH, and EC. Confirmed successfully treated material will be backfilled within the excavation area; soil that meets BTEX and TPH standards but remains above pH and/or EC standards will be placed greater than 3' bgs and covered with treated or imported soil meeting BTEX, TPH-GRO, TPH-DRO, pH, and EC 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 # \_\_\_\_\_  
Yes \_\_\_\_\_ Excavate and onsite remediation  
No \_\_\_\_\_ Land Treatment  
No \_\_\_\_\_ Bioremediation (or enhanced bioremediation)  
Yes \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Other \_\_\_\_\_

## Groundwater Remediation Summary

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
No \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Air sparge / Soil vapor extraction  
No \_\_\_\_\_ Natural Attenuation  
No \_\_\_\_\_ 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 has not been encountered in any of the subject pits. Groundwater impacts are not anticipated to be encountered during assessment, remediation or closure activities.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Remediation work plan

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

☒ Other Remediation work plan

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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.

Future post-remediation reclamation activities at the subject facilities will be compliant with applicable COGCC regulations.

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). 12/01/2016

Date of commencement of Site Investigation. 12/01/2016

Date of completion of Site Investigation. 12/03/2016

### REMEDIAL ACTION DATES

Date of commencement of Remediation. \_\_\_\_\_

Date of completion of Remediation. \_\_\_\_\_

### SITE RECLAMATION DATES

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

### OPERATOR COMMENT

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

Signed: Rachel Grant

Title: Senior HSE / Regulatory

Submit Date: 05/10/2017

Email: rgrant@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: CARLOS LUJAN

Date: 05/31/2017

Remediation Project Number: 9864

### COA Type

### Description

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## **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

401257683	FORM 27-SUPPLEMENTAL-SUBMITTED
401259538	ANALYTICAL RESULTS
401259556	ANALYTICAL RESULTS
401259723	SITE MAP
401259724	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

## **General Comments**

### User Group

### Comment

### Comment Date

Environmental	Please submit a 2017 remediation time table for the Sites mentioned in this supplemental e-form 27	05/31/2017
Environmental	Following completion of remediation to Table 910-1 compliance, coordinate all reclamation/re-seeding activities on Federal surface lands with BLM Grand Junction Field Office representative; Robert Hartman, bhartman@blm.gov, 970 244 3041	05/10/2017

Total: 2 comment(s)