

State of Colorado

Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
Document Number: <b>401480311</b>			
Date Received: <b>12/27/2017</b>			

SUNDRY NOTICE

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number; identify Oil and Gas Location by Location ID Number; identify other Facility by Facility ID Number.

OGCC Operator Number: 10112	Contact Name: ALYSSA BEARD	Complete the Attachment Checklist															
Name of Operator: FOUNDATION ENERGY MANAGEMENT LLC	Phone: (303) 244-8114																
Address: 5057 KELLER SPRINGS RD STE 650	Fax: (303) 861-0604																
City: ADDISON State: TX Zip: 75001 Email: abeard@foundationenergy.com																	
API Number : 05- 045 00 OGCC Facility ID Number: 112105 Well/Facility Name: GOVERNMENT 1-5 Well/Facility Number: Location QtrQtr: SESE Section: 5 Township: 8S Range: 104W Meridian: 6 County: GARFIELD Field Name: BRIDLE Federal, Indian or State Lease Number:		<div>OP OGCC</div> <table border="1"> <tr><td>Survey Plat</td><td></td><td></td></tr> <tr><td>Directional Survey</td><td></td><td></td></tr> <tr><td>Srvc Eqpmt Diagram</td><td></td><td></td></tr> <tr><td>Technical Info Page</td><td></td><td></td></tr> <tr><td>Other</td><td></td><td></td></tr> </table>	Survey Plat			Directional Survey			Srvc Eqpmt Diagram			Technical Info Page			Other		
Survey Plat																	
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Other																	

CHANGE OF LOCATION OR AS BUILT GPS REPORT

☐ Change of Location \*
☐ As-Built GPS Location Report
☐ As-Built GPS Location Report with Survey

\* Well location change requires new plat. A substantive surface location change may require new Form 2A.

SURFACE LOCATION GPS DATA Data must be provided for Change of Surface Location and As Built Reports.

Latitude PDOP Reading Date of Measurement  
Longitude GPS Instrument Operator's Name

LOCATION CHANGE (all measurements in Feet)

Well will be: (Vertical, Directional, Horizontal)

FNL/FSL

FEL/FWL

Change of Surface Footage From Exterior Section Lines:

Change of Surface Footage To Exterior Section Lines:

Current Surface Location From QtrQtr SESE Sec 5 Twp 8S Range 104W Meridian 6

New Surface Location To QtrQtr Sec Twp Range Meridian

Change of Top of Productive Zone Footage From Exterior Section Lines:

Change of Top of Productive Zone Footage To Exterior Section Lines:

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Current Top of Productive Zone Location From Sec Twp Range

New Top of Productive Zone Location To Sec Twp Range

Change of Bottomhole Footage From Exterior Section Lines:

Change of Bottomhole Footage To Exterior Section Lines:

\*\*

Current Bottomhole Location Sec Twp Range

New Bottomhole Location Sec Twp Range

\*\* attach deviated drilling plan

Is location in High Density Area?

Distance, in feet, to nearest building , public road: , above ground utility: , railroad: ,  
property line: , lease line: , well in same formation:

Ground Elevation feet Surface owner consultation date

**OTHER CHANGES**

☐ **REMOVE FROM SURFACE BOND**      Signed surface use agreement is a required attachment

☐ **CHANGE OF WELL, FACILITY OR OIL & GAS LOCATION NAME OR NUMBER**

From:      Name    GOVERNMENT 1-5                      Number    \_\_\_\_\_                      Effective Date: \_\_\_\_\_

To:          Name    \_\_\_\_\_                      Number    \_\_\_\_\_

☐ **ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.**

☐ WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number \_\_\_\_\_ has not been drilled.

☐ PIT: Abandon Earthen Pit Permit (Form 15) – COGCC Pit Facility ID Number \_\_\_\_\_ has not been constructed (Permitted and constructed pit requires closure per Rule 905)

☐ CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number \_\_\_\_\_ has not been constructed (Constructed facility requires closure per Rule 908)

OIL & GAS LOCATION ID Number: \_\_\_\_\_

☐ Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

☐ Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

**Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.**

☐ **REQUEST FOR CONFIDENTIAL STATUS**

☐ **DIGITAL WELL LOG UPLOAD**

☐ **DOCUMENTS SUBMITTED**      Purpose of Submission: \_\_\_\_\_

**RECLAMATION**

**INTERIM RECLAMATION**

☐ Interim Reclamation will commence approximately \_\_\_\_\_

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

☐ Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

**Field inspection will be conducted to document Rule 1003.e. compliance**

**FINAL RECLAMATION**

☐ Final Reclamation will commence approximately \_\_\_\_\_

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

☐ Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

**Field inspection will be conducted to document Rule 1004.c. compliance**

Comments:

## ENGINEERING AND ENVIRONMENTAL WORK

### ☐ NOTICE OF CONTINUED TEMPORARILY ABANDONED STATUS

Indicate why the well is temporarily abandoned and describe future plans for utilization in the COMMENTS box below or provide as an attachment, as required by Rule 319.b.(3).

Date well temporarily abandoned \_\_\_\_\_ Has Production Equipment been removed from site? \_\_\_\_\_

Mechanical Integrity Test (MIT) required if shut in longer than 2 years. Date of last MIT \_\_\_\_\_

☐ SPUD DATE: \_\_\_\_\_

## TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

☐ NOTICE OF INTENT Approximate Start Date \_\_\_\_\_

☒ REPORT OF WORK DONE Date Work Completed 12/03/2016

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Intent to Recomplete (Form 2 also required) | <input type="checkbox"/> Request to Vent or Flare   | <input type="checkbox"/> E&P Waste Management Plan     |
| <input type="checkbox"/> Change Drilling Plan                        | <input type="checkbox"/> Repair Well  | <input type="checkbox"/> Beneficial Reuse of E&P Waste |
| <input type="checkbox"/> Gross Interval Change                       | <input type="checkbox"/> Rule 502 variance requested. Must provide detailed info regarding request.   |  |
| <input type="checkbox"/> Other _____                                 | <input checked="" type="checkbox"/> Status Update/Change of Remediation Plans for Spills and Releases |  |

## COMMENTS:

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 at the ten locations in December 2016 and selected six of the pits for remediation and closure (Figure 1). Per COGCC Environmental group directives in the approved Form 27 Site Investigation and Remediation Workplan Supplemental Form (General Comments of document #401199050), Foundation is submitting this "Notice of Completion" via Form 4 with supporting data for closure of the Government 1-5 pit (Facility ID 112105).

Assessment activities conducted at the Government 1-5 pit location were performed in accordance with the approved Form 27 referenced above and are described below.

Industry-standard methodologies (i.e., advancement of exploratory excavations) were utilized at the subject pit location to determine if soil impacts were present. Pit soil sampling and analysis was conducted as follows:

- One base sample was collected from the approximate center of the pit at ~8' below ground surface (bgs) and submitted to Summit Scientific (Summit) for analysis of the full Table 910-1 soil analytical suite: BTEX and TPH-GRO by USEPA Method 8260C, TPH-DRO by USEPA Method 8015, Table 910-1 polycyclic aromatic hydrocarbons (PAH) compounds by USEPA Method 8270, electrical conductivity (EC), and pH;

- Four sidewall samples were collected from the approximate lateral extent of the pit between ~6' bgs and 10' bgs and submitted to Summit for analysis of BTEX, TPH-GRO, TPH-DRO, EC, and pH utilizing the same analytical methods listed above.

Laboratory results indicated that the base and sidewall soil samples were below the applicable COGCC Table 910-1 standards, except for arsenic. The arsenic concentration in the pit base sample was below background arsenic levels in the area, which were previously submitted (document #401259556). Groundwater was not encountered during pit assessment sample collection activities.

Assessment soil sample analytical data is presented in Table 1, and the assessment soil sample locations are illustrated on Figure 2. The laboratory analytical report is included as Attachment A.

Subsequent to sample collection activities, the exploratory excavations were backfilled with native materials. Future reclamation and pit closure activities at the site will be compliant with applicable COGCC regulations.

Based on the assessment activities conducted, and the soil sample analytical data presented herein, Foundation Energy Management is requesting a No Further Action (NFA) determination for this pit.

## H2S REPORTING

Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.

**Gas Analysis Report must be attached.**

H2S Concentration: \_\_\_\_\_ in ppm (parts per million)

Date of Measurement or Sample Collection \_\_\_\_\_

Description of Sample Point:

Absolute Open Flow Potential \_\_\_\_\_ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: \_\_\_\_\_

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: \_\_\_\_\_

COMMENTS:

**Best Management Practices**

**No BMP/COA Type**

**Description**

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**Operator Comments:**

Based on the pit assessment activities conducted at the site and the analytical results presented herein, Foundation Energy Management is requesting a NFA determination for the Government 1-5 pit (Facility ID 112105).

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

Signed: \_\_\_\_\_ Print Name: ALYSSA BEARD  
Title: EHS & REGULATORY Email: abeard@foundationenergy.com Date: 12/27/2017

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: Spencer, Stan Date: 1/4/2018

**CONDITIONS OF APPROVAL, IF ANY:****COA Type****Description**

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**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	<p>Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required. In addition, the non-working surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules plus all BLM requirements for Federal surface lands.</p> <p>This NFA is for this pit only. When all pits listed under REM 9864 have been closed, submit a Supplemental F-27 with a request for closure and a list of all F-4 document #s with supporting data for the individual pit closures.</p>	01/04/2018

Total: 1 comment(s)

**Attachment Check List**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
401480311	SUNDRY NOTICE APPROVED-REMED
401491634	ANALYTICAL RESULTS
401502437	FORM 4 SUBMITTED

Total Attach: 3 Files