

# State of Colorado Oil and Gas Conservation Commission

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401896776

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01/17/2019

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.

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> Phone: <u>(303) 2448114</u> Mobile: <u>(720) 2572302</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 #: 11164Initial Form 27 Document #: 401593551

#### 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>112083</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>FEDERAL NORTH WILDHORSE 7-27</u>		Latitude: <u>40.635728</u>	Longitude: <u>-104.094663</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWNE</u>	Sec: <u>28</u>	Twp: <u>8N</u>	Range: <u>60W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications MLMost Sensitive Adjacent Land Use RangelandIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

## 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
UNDETERMINED	SOILS	0	Soil sampling

### INITIAL ACTION SUMMARY

Description of initial action or emergency response measures taken to abate, investigate, and/or remediate impacts associated with E&P Waste.

Foundation plans to collect soil samples at the Wildhorse 7-28 pit location in the locations provided on the attached Proposed Soil Sample Location map. The samples will be collected with a hand auger decontaminated between each sample location. Once the sample locations have been approved, Foundation will schedule pit closure soil sampling in order to determine if impacts are present.

### 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 will be collected from 5 locations (4 sidewall and 1 base) shown on the attached map.

#### 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 ):

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 5

Number of soil samples exceeding 910-1 4

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

Approximate areal extent (square feet) 60

### NA / ND

-- Highest concentration of TPH (mg/kg) 6500

-- Highest concentration of SAR 4.58

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 5

### 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   

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

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?

☐ 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?

Soil impacts were discovered during sampling with a hand auger which occurred on 1/7/19. The extent will not be known until excavation activities commence and confirmation soil samples are collected. Samples were collected from 1.5' below ground surface on the pit sidewalls (not 1.5' from the top of the earthen berm), and at 3.5' below ground surface at the base of the pit.

# 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.

Soil samples will be collected from the locations proposed on the attached map and analyzed for BTEX, TPH, EC, SAR, and pH. Should any of the samples exceed the Table 910-1 standard, soil will be removed from the impacted area until a clean sample is obtained. Soil removed from the pit due to impacts will be taken to the Waste Management Ault facility or Pawnee Waste facility in Grover, Colorado.

## 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.

Soils that are impacted above the Table 910-1 standard will be removed through excavation. Confirmation soil samples will be collected and run overnight at Summit Scientific to determine if DRO-impacted soil has been removed from the pit footprint. The base of the pit will be excavated and sampled to confirm the laboratory results from the hand auger sample collected 1/7/19. A subsequent Form 27 will be submitted after the excavation has taken place which will include the confirmation sample results, as well as waste manifests from soil disposal.

## Soil Remediation Summary

☐ In Situ

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

☒ Ex Situ

Yes \_\_\_\_\_ Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 0  
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
No \_\_\_\_\_ 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.

NA

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

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

**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 \_\_\_\_\_

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.

Once soil samples collected from the base and sidewalls of the pit show concentrations less than the Table 910-1 standard, the berms will be pushed into the base of the pit. Additional topsoil will be brought in and compacted to bring the pit area to surface and prepared for seeding with dryland pasture mix. The Federal Wildhorse well is scheduled to be plugged and abandoned in February/March 2019 by Foundation. The entire location will be reclaimed subsequent to that effort.

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? No \_\_\_\_\_

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

## IMPLEMENTATION SCHEDULE

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. 01/08/2019

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/07/2019

Date of commencement of Site Investigation. 01/07/2019

Date of completion of Site Investigation. 01/07/2019

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/11/2019

Date of completion of Remediation. 02/15/2019

### SITE RECLAMATION DATES

Date of commencement of Reclamation. 03/01/2019

Date of completion of Reclamation. 03/07/2019

### OPERATOR COMMENT

Emailed Vern Koehler of US Forest Service on 1/8/19 to confirm seed mix for reclamation, but have not heard back as yet due to government shutdown.  
As mentioned in the Reclamation Plan, Foundation has submitted a Notice of Intent to P&A the Wildhorse well, scheduled for February or March 2019.

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: 01/17/2019

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: 01/18/2019

Remediation Project Number: 11164

### COA Type

### Description

	If overexcavation of hydrocarbon impacted material does not extend beyond the pit berm footprint, Operator shall analyze surface material within the pit berms for ph, EC and SAR.
	Any pit berm material that is not disposed, but is stockpiled for backfill shall comply with the Table 910-1 Concentration Levels.

### 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

401896776	FORM 27-SUPPLEMENTAL-SUBMITTED
401908855	ANALYTICAL RESULTS
401908856	ANALYTICAL RESULTS
401908893	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

### General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)