

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402777797  
Receive Date:  
11/16/2021

Report taken by:  
John Heil

Site Investigation and Remediation Workplan (Initial 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>	<b>Phone Numbers</b>
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>	
		Phone: <u>(303) 244-8114</u>
		Mobile: <u>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20926 Initial Form 27 Document #: 402777797

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: \_\_\_\_\_

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>103-10508</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>COLUMBINE SP FED 7C-24-4-104</u>	Latitude: <u>39.696010</u>	Longitude: <u>-109.017510</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>24</u>	Twp: <u>4S</u>	Range: <u>104W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>316431</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>COLUMBINE SP FED-64S104W 24NWSE</u>	Latitude: <u>39.696010</u>	Longitude: <u>-109.017510</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>24</u>	Twp: <u>4S</u>	Range: <u>104W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: OFF-LOCATION FLOWLINE Facility ID: 480610 API #: \_\_\_\_\_ County Name: RIO BLANCO  
Facility Name: Wellhead Line 11NESE Latitude: 39.723392 Longitude: -109.031173  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: NESE Sec: 11 Twp: 4S Range: 104W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

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

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

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

# 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 type="checkbox"/> Oil                       | <input type="checkbox"/> Tank Bottoms                |  |
| <input 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
UNDETERMINED	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.

Foundation is planning to document conditions beneath all equipment at the Columbine Sp Fed 7C-24-4-104 well location (ID: 316431) through observation and field screening when equipment is removed. Photos will be taken during removal of equipment and submitted on a Supplemental Form 27. 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, 1 produced water tank, and 1 separator. The off-location flowline associated with this well will be abandoned in place per Rule 1105.d. Locations where the flowline connects to the wellhead and riser will be investigated and soil samples will be collected from the areas most likely impacted by the flowline.

## 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 ):

A minimum of four (4) soil samples will be collected as a part of the facility closure investigation, collected after each piece of equipment is removed from the location. The wellhead and tank sample will be analyzed for the full list of COGCC Table 915-1 constituents. If field screening indicates a negative hydrocarbon presence, Foundation is requesting a reduced analyte list consisting of TPH (GRO/DRO/ORO), BTEX, SAR, EC, and pH for the separator and flowline samples.

### 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 ):

TBD.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 4

NA Highest concentration of TPH (mg/kg) \_\_\_\_\_

Number of soil samples exceeding 915-1 0 NA Highest concentration of SAR \_\_\_\_\_  
 Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_ BTEX > 915-1 \_\_\_\_\_  
 Approximate areal extent (square feet) 0 Vertical Extent > 915-1 (in feet) 0

**Groundwater**

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l) \_\_\_\_\_  
 Was extent of groundwater contaminated delineated? No Highest concentration of Toluene (µg/l) \_\_\_\_\_  
 Depth to groundwater (below ground surface, in feet) \_\_\_\_\_ Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
 Number of groundwater monitoring wells installed \_\_\_\_\_ Highest concentration of Xylene (µg/l) \_\_\_\_\_  
 Number of groundwater samples exceeding 915-1 \_\_\_\_\_ 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 will be collected from an undisturbed area to use as a baseline for Table 915-1 reclamation standards.  
 \_\_\_\_\_
- 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**

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

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.

**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.

Since soil samples have not yet been collected, Foundation will require additional data to develop the remediation plan. 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**

- |   |   |
|---|---|
| <input type="checkbox"/> <b>In Situ</b>             | <input type="checkbox"/> <b>Ex Situ</b>                               |
| _____ Bioremediation ( or enhanced bioremediation ) | _____ Excavate and offsite disposal                                   |
| _____ Chemical oxidation                            | _____ If Yes: Estimated Volume (Cubic Yards) _____                    |
| _____ Air sparge / Soil vapor extraction            | _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ |
| _____ Natural Attenuation                           | _____ Excavate and onsite remediation                                 |
| _____ Other _____                                   | _____ 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: \_\_\_\_\_

# 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.

Final reclamation will be performed in accordance with the 1000 series rules once all soil samples show concentrations less than the Table 915-1 standard. 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. \_\_\_\_\_

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. 09/30/2021 \_\_\_\_\_

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**

Please forward to John Heil.  
 This Initial Form 27 is being submitted to outline the site investigation plan for the closure of the Columbine Sp Fed 7C-24-4-104 facility (Location ID: 316431) and to obtain a REM number. The proposed soil sample locations are included on the attached map.

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

Signed: Afton Iiams \_\_\_\_\_

Title: HSE/Regulatory Technician \_\_\_\_\_

Submit Date: 11/16/2021 \_\_\_\_\_

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: John Heil \_\_\_\_\_

Date: 11/22/2021 \_\_\_\_\_

Remediation Project Number: 20926 \_\_\_\_\_

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

	If impacts are discovered, operator shall comply with Rule 913.b.(2) and conduct sampling and analysis of soil and Groundwater (if encountered or a pathway to groundwater is determined) pursuant to Rule 915 to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 or in WQCC Regulation 41 numeric and narrative Groundwater quality standards and classifications, as incorporated by reference in Rule 901.b.
1 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**

402777797	FORM 27-INITIAL-SUBMITTED
402777852	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

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

Environmental	COGCC GISOnline indicates a River/Stream to the west and east of the location.	11/22/2021
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Total: 1 comment(s)