

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

John Heil

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>XTO ENERGY INC</u>	Operator No: <u>100264</u>	Phone Numbers
Address: <u>210 PARK AVENUE STE 2240</u>		Phone: <u>(405) 594-9457</u>
City: <u>OKLAHOMA CITY</u> State: <u>OK</u> Zip: <u>73102</u>		Mobile: <u>(970) 462-1948</u>
Contact Person: <u>Erin Clark</u>	Email: <u>erin.k.clark@exxonmobil.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22838 Initial Form 27 Document #: 402891749

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>103-08096</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>FEDERAL 1-30 1</u>	Latitude: <u>40.205282</u>	Longitude: <u>-108.313559</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>30</u>	Twp: <u>3N</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>315221</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>RIO BLANCO FED-63N97W 30NENE</u>	Latitude: <u>40.205187</u>	Longitude: <u>-108.313490</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>30</u>	Twp: <u>3N</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Non-Crop Land

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

NA

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
Yes	SOILS	8 feet by 9 feet by 7 feet bgs	Laboratory analysis of soil samples.

INITIAL ACTION SUMMARY

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

See Initial Form 27 Document 402891749.

This remediation project was opened to comply with COGCC Rule 911.a.(4) and BLM Written Order (WO) #20KR0070W issued on 7/23/2020. The WO directed the former Title holders to P&A the well as current operator, Sonterra Energy LLC appears to no longer be viable. Form 27 Document 402891749 served as the initial notification to decommission COGCC Location 315221, including the abandonment of the FEDERAL 1-30 #1 (API# 05-103-08096) well, associated surface equipment, and in-place flowline abandonment. Although this form is being submitted by XTO ENERGY INC, please note the the location and well are associated with SONTERRA ENERGY, L.L.C. (Operator ID 80890). XTO does not own or operate the well. This form is being submitted to present recent soil sampling results and to request closure of the remediation project. The attached Report of Work Completed (ROWC) details these results.

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):

No additional soil sampling is proposed.

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

NA / ND

Number of soil samples collected 21

-- Highest concentration of TPH (mg/kg) 435

Number of soil samples exceeding 915-1 20

-- Highest concentration of SAR 67.4

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

BTEX > 915-1 No

Approximate areal extent (square feet) 72

Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? Yes

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?

COGCC Form 27 Document 403157992 was submitted September 12, 2022 to request a reduced analyte list of hexavalent chromium and to request consideration of COGCC Table 915-1 Footnotes 1 and 11 to establish alternative allowable limits. XTO requested alternative allowable limits for EC, SAR, pH, and arsenic of 20.200, 308 millimhos per centimeter (mmhos/cm), 10.3, and 31.75 milligrams per kilogram (mg/kg), respectively. This form and associated requests were approved September 20, 2022.

☐ 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.

Impacted material was removed and transported to a licensed disposal facility.

REMEDIAL ACTION 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.

From May 10 to July 19, 2022, soil samples were collected in accordance with COGCC Rule 911.a to facilitate facility decommissioning. Confluence personnel inspected the wellhead excavation, flowline trenches, and the footprints of all previous equipment and infrastructure, including the tanks, pump jack, separator, meter house, and dehydration unit. Soil samples were submitted for laboratory analysis of COGCC Table 915-1 soil constituents.

A hexavalent chromium exceedance of 1.35 mg/kg was identified at the wellhead flowline connection at 4 feet bgs. An additional 3 feet of material were removed from the base of the excavation, and another base sample was collected at 7 feet bgs on September 28, 2022. Analytical results of the subsequent sample were below lab detection limits for hexavalent chromium. Hexavalent chromium exceedances remain within the project area. However, the exceedances in all soil samples collected from final excavation extents are labeled with a "J" qualifier; stating that the identification of the analyte was made, however, the concentration is only an estimate due to a minimal amount of the analyte being exhibited in the sample material. XTO requests consideration of the "J" qualifier data from the COGCC as an estimated value and not an exceedance. Based on these analytical results, XTO requests closure of this remediation project with a no further action (NFA) determination. See the attached ROWC for more information.

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 NFA Request

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

XTO Energy is not the Operator of Record for the Federal 1-30 and as such is not required to provide financial assurance for the referenced well. Financial Assurance obligations would fall on Sonterra Energy as they are the Operator of Record.

Operator anticipates the remaining cost for this project to be: \$ 0

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? Yes _____

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? Yes _____

Does Groundwater meet Table 915-1 standards? Yes _____

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.

All disturbance areas will be returned to grade with suitable material in preparation for final reclamation activities pursuant to the COGCC 1000 Series Rules.

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). 05/10/2022

Proposed site investigation commencement. 05/10/2022

Proposed completion of site investigation. 09/28/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/13/2022

Proposed date of completion of Remediation. 09/28/2022

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 has been submitted to provide the COGCC with updated site investigation information and to request closure of the remediation project. Please find site investigation details in the attached ROWC.

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

Signed: Erin Clark

Title: Lead Regulatory Coord.

Submit Date: 01/06/2023

Email: erin.k.clark@exxonmobil.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: 01/17/2023

Remediation Project Number: 22838

COA Type**Description**

	Based on a review of the information provided, it appears that no further action is necessary at this time and COGCC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.
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**

403260144	FORM 27-SUPPLEMENTAL-SUBMITTED
403281838	ANALYTICAL RESULTS

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)