

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403159053

Receive Date:

09/08/2022

Report taken by:

Laurel Anderson

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>FUNDARE RESOURCES OPERATING COMPANY LLC</u>	Operator No: <u>10773</u>	Phone Numbers
Address: <u>5251 DTC PKWY STE 950</u>		Phone: <u>(303) 910-4511</u>
City: <u>GREENWOOD VILLAGE</u> State: <u>CO</u> Zip: <u>80111</u>		Mobile: <u>()</u>
Contact Person: <u>Sydney Smith</u>	Email: <u>ssmith@fundareresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15397 Initial Form 27 Document #: 402363826

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>LOCATION</u>	Facility ID: <u>460754</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Terrace Gas Plant</u>	Latitude: <u>40.845550</u>	Longitude: <u>-103.908040</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>18</u>	Twp: <u>10N</u>	Range: <u>58W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>468836</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Terrace Gas Plant</u>	Latitude: <u>40.845550</u>	Longitude: <u>-103.908040</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>18</u>	Twp: <u>10N</u>	Range: <u>58W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications GM _____

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

None 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 type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input checked="" 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
Yes	GROUNDWATER	Full extent unknown; known MW1	Monitor well
Yes	SOILS	~100'x100'	soil borings

INITIAL ACTION SUMMARY

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

A Form 19 (Release Point ID 468836) was previously submitted. Hydrocarbon impacted soils was discovered during decommissioning of the facility. The historical impacts were removed via mechanical excavation. Due to the depth of the impacts, soil borings were advanced to delineate the impacts.

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):

During the decommissioning of the facility soil impacts were discovered. A minimum of two bottom hole and four sidewall grab samples will be collected and analyzed for BTEX and TPH.

Proposed Groundwater Sampling

☒ Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Quarterly groundwater monitoring will be conducted at this site to include gauging and sampling of all monitor wells that do not contain phase separated hydrocarbons (PSH). Groundwater will be analyzed for BTEX.

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 41

Number of soil samples exceeding 915-1 4

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

NA / ND

-- Highest concentration of TPH (mg/kg) 4300

NA Highest concentration of SAR

BTEX > 915-1 Yes

Approximate areal extent (square feet) 10000Vertical Extent > 915-1 (in feet) 35**Groundwater**Number of groundwater samples collected 7-- Highest concentration of Benzene (µg/l) 5500Was extent of groundwater contaminated delineated? No-- Highest concentration of Toluene (µg/l) 8600Depth to groundwater (below ground surface, in feet) 49-- Highest concentration of Ethylbenzene (µg/l) 1500Number of groundwater monitoring wells installed 3-- Highest concentration of Xylene (µg/l) 4800Number of groundwater samples exceeding 915-1 4NA Highest concentration of Methane (mg/l) **Surface Water**0 Number of surface water samples collected0 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?☒ Was investigation derived waste (IDW) generated as part of this investigation?Volume of solid waste (cubic yards) 3Volume of liquid waste (barrels) 1☒ Is further site investigation required?

Further soil sampling and monitor wells may will be required to delineate the extent of impacts. Once and if the newly installed monitor wells contain water they will be sampled to determine the current extents.

REMEDIAL ACTION PLANDoes this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

The impacted soils will be mechanically excavated to a depth that they can be safely removed. Several remedial options will be considered to remediate any remaining impacts that are located >20' BGS.

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.

In order to fully characterize the extent of groundwater impacts Whiting plans on advancing three monitor wells as indicated in Figure 4 of the Groundwater Monitoring Report First Quarter 2021 report. One of the delineation wells has been proposed to the south address any potential impacts related to the pipeline that enters from the south and the Nelson Ranches C-1 areas. The wells will be screened and advanced to a sufficient depth to allow for a ~10' water column. Upon completion of these wells in lieu of ORC socks a 5-day MDPE event will be conducted on the onsite monitor wells. The MDPE event is a more aggressive remediation technology that will both facilitate the remediation of the groundwater and the soils. These proposed activities are planned on being conducted prior to 10/15/21. If these proposed delineations wells are impacted additional wells will be installed to fully delineate the groundwater impacts.

As depicted in the attached 1st quarter groundwater monitoring report we included the analytes Naphthalene, 1,2,4-trimethylbenzene (1,2,4-TMB) 1,3,5-trimethylbenzene (1,3,5-TMB), chloride, sulfate, and TDS were analyzed to comply with COGCC Table 915-1 Clean-up Concentrations. Whiting will continue sampling for these analytes during future groundwater monitoring events.

The extents of the soil impacts in the excavation are depicted in the attached Fig_2_AE2_Soil_Concentration Map. There is only one location within the larger/southern excavation that exceeds TPH standards (SSW-2 @ 15'), however this was removed and five feet below concentrations are non-detect (SSW-2 @ 20'). The stockpile was sampled on 12/22/20 with each sample representing 100 cubic yards of the stockpile. Three of the samples were above thresholds representing 300 cubic yards of the 2,700 cubic yard stockpile. Whiting is proposing to utilize the portions of the stockpile that are below thresholds to backfill the excavation and dispose of the 300 cubic yards (SP.01,

Soil Remediation Summary

☒ In Situ

☐ Yes Bioremediation (or enhanced bioremediation)
☐ Yes Chemical oxidation
☐ Yes Air sparge / Soil vapor extraction
☐ Yes Natural Attenuation
☐ No Other _____

☒ Ex Situ

☐ Yes Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 300
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

☐ Yes Bioremediation (or enhanced bioremediation)
☐ Yes Chemical oxidation
☐ Yes Air sparge / Soil vapor extraction
☐ Yes 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.

Quarterly groundwater monitoring to include gauging all wells and sampling and analysis (BTEX) of all wells that do not contain PSH.

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

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.

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

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards 2700

E&P waste (solid) description Impacted Soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Pawnee Waste

Volume of E&P Waste (liquid) in barrels 1

E&P waste (liquid) description Purge water

COGCC Disposal Facility ID #, if applicable: 440165

Non-COGCC Disposal Facility:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

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.

Reclamation activities at the site will be compliant with 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 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. 10/21/2019

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/21/2019

Proposed site investigation commencement. 10/21/2019

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/23/2019

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

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

Signed: Sydney Smith

Title: Director EHSR

Submit Date: 09/08/2022

Email: ssmith@fundareresources.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: Laurel Anderson

Date: 02/22/2023

Remediation Project Number: 15397

COA Type**Description**

	On the subsequent Supplemental Form 27 Operator shall fully populate the Implementation Schedule to indicate: the most recent date of surface owner notification/consultation (if more recent), spill/release date, and the estimated timeframe expected for completion of site investigation and remediation.
	Operator shall complete the Adequacy of Operator's General Liability Insurance and Financial Assurance section on the next Form 27 Subsequent to provide information about their general liability insurance coverage and an estimate of remaining project costs based on current available data as required per Rule 705.f.
	Operator has not provided a comprehensive list of all sensitive receptors located within 1/4 mile of the site. Operator shall update the relevant sections on the subsequent Supplemental Form 27.
	Remediation Summary does not appear to have been updated to reflect all remedial activities to date. Operator is directed to update the Remediation Summary section on the subsequent Supplemental Form 27.
	Operator shall submit a minimum of one soil sample for laboratory analysis of Table 915 - 1 Parameters from each soil boring advanced during monitoring well installation. The sample collected will be from the interval(s) displaying the highest degree of impacts.
	In accordance with Rule 915 additional monitoring well(s) are required to define the horizontal extent of impacts to groundwater. A downgradient well to the southwest of MW-1 is required to establish point of compliance. Note: More than one well may be required to obtain a point of compliance depending on laboratory analytical results and changes in groundwater flow direction.
6 COAs	

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**

403159053	FORM 27-SUPPLEMENTAL-SUBMITTED
403159056	MONITORING REPORT

Total Attach: 2 Files

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

Environmental	COGCC has added Spill ID 468836 to the Site Information section of the subject form.	02/22/2023
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Total: 1 comment(s)