

# State of Colorado Energy & Carbon Management Commission

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Document Number:

403364196

Receive Date:

06/09/2023

Report taken by:

Kyle Waggoner

## 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>                | <b>Phone Numbers</b>          |
| 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 #: 22832 Initial Form 27 Document #: 402979959

#### 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>071-09126</u>       | County Name: <u>LAS ANIMAS</u>                                  |
| Facility Name: <u>APACHE CANYON 6-9V</u>       | Latitude: <u>37.112225</u> | Longitude: <u>-104.924301</u> |   |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |   |
| QtrQtr: <u>NESE</u>                            | Sec: <u>6</u>              | Twp: <u>34S</u>               | Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |
| Facility Type: <u>PIT</u>                      | Facility ID: <u>292612</u> | API #: _____                  | County Name: <u>LAS ANIMAS</u>                                  |
| Facility Name: <u>APACHE CANYON 06-09V</u>     | Latitude: <u>37.112225</u> | Longitude: <u>-104.924301</u> |   |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |   |
| QtrQtr: <u>NESE</u>                            | Sec: <u>6</u>              | Twp: <u>34S</u>               | Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

## SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Forest

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**

Wells registered in the area per Division of Water Resources within 1/4 mile are not domestic water wells.

## **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          | approx. 1,000 sq ft | 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.

COGCC Form 27 Document 402979959 was submitted to open Remediation Project Number 22832 for site investigation associated with associated with the APACHE CANYON 6-9V (API# 05-071-09126) well P&A and associated pit closure (COGCC Facility ID 292612). See the attached Report of Work Completed (ROWC) for details.

### **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 ):

No groundwater was encountered during initial investigation.

#### **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 27

Number of soil samples exceeding 915-1 14

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

Approximate areal extent (square feet) 1000

### NA / ND

-- Highest concentration of TPH (mg/kg) 638

-- Highest concentration of SAR 17.2

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 14

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

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

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?

See attached Site Diagram and table detailing background soil sampling.

☐ 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.

Visually impacted soil from the pit was excavated and transported to a licensed disposal facility.

## 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.

From September 6, 2022 to March 14, 2023, characterization sampling was performed. Personnel inspected the wellhead excavation, flowline trenches, equipment footprints, and historical pit area. One soil sample was collected from the wellhead excavation at 3.5 feet below ground surface (bgs), two soil samples were collected beneath the former meter house footprint, three soil samples were collected from the flowline trenches, and seven soil samples were collected from the base and sidewalls of the historical pit. Twelve soil samples were later collected in and around the wellhead area to delineate pH exceedances. Excavated soil was stockpiled on site and composite sampled for characterization. From July 7 to December 1, 2022, twelve background soil samples were collected from nearby, native, non-impacted soil to characterize native levels of inorganic constituents of concern at the Location.

Laboratory results of P&A characterization samples are compliant with COGCC Table 915-1 Residential Soil Screening Levels for all constituents except for pH, arsenic, and hexavalent chromium. Laboratory results of pit characterization samples are compliant with COGCC Table 915-1 Residential Soil Screening Levels for all constituents except for SAR, pH, arsenic, and hexavalent chromium. Analytical results of stockpile characterization are compliant with COGCC Table 915-1 Residential Soil Screening Levels for all constituents except for arsenic after the TPH recharacterization sample. Arsenic and hexavalent chromium were removed as constituents of concern based on produced water characterization data presented and approved via Document 403186127. All constituents of concern related to the pit investigation are within allowable limits except for SAR and pH, and all constituents of concern related to the P&A investigation are within allowable limits except for pH. XTO requests to leave elevated inorganics in place with a 915.b. reclamation plan. See the attached ROWC for details.

## Soil Remediation Summary

☐ In Situ

☐ Ex Situ

\_\_\_\_\_ 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.

Groundwater was not encountered during site investigation.

## 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 Q1 2023 Remediation Status Update

### 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 / ExxonMobil is self-insured for general liability in excess of \$5,000,000 and has active COGCC financial assurance in the amount of \$1,570,750.

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

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

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. See the attached 915.b. Reclamation Plan for details. All reclamation and monitoring work will be completed by OGRIS Operating as this pad is shared with their Apache Canyon 6-10V well.

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). 09/06/2022

Proposed site investigation commencement. 09/06/2022

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/06/2022

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**

This form has been submitted to provide results of Q1 2023 site investigation to the COGCC and to request closure of Remediation Project Number 22832 leaving elevated inorganics in place and managed with a reclamation plan. Please see the attached ROWC for details regarding site investigation and the attached Reclamation Plan for details regarding site reclamation.

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: 06/09/2023

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: Kyle Waggoner

Date: 08/24/2023

Remediation Project Number: 22832

**COA Type****Description**

|  |  |
|--|--|
|  | Prior to submitting a Reclamation Plan for Soil Suitability for Reclamation Operator must fully delineate soils before a reclamation plan can be reviewed.   |
|  | Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.  |
|  | Operator will continue quarterly reporting until the site investigation is complete and the implementation schedule can be updated.  |
|  | ECMC removed Final Closure Request, Lab analysis supplied indicated there was an elevated level of TPH in Stockpile SP-1 and elevated levels of Chromium (VI) in samples; CS-4, CS-8, CS-10, CS-11 and CS-12.<br><br>Organic Compounds in Soils and Metals in Soils must comply with Table 915-1 Standards before final closure can be achieved. |

4 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**

|           |  |
|-----------|--|
| 403364196 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 403428660 | ANALYTICAL RESULTS                               |
| 403428667 | RECLAMATION PLAN                                 |
| 403508018 | FORM 27-SUPPLEMENTAL-SUBMITTED                   |

Total Attach: 4 Files

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

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)