

**Conditions of Approval - Supplemental Form 27 (2Q23 Resubmittal) DOCUMENT #403510714 –
Additional information for individual Conditions of Approval noted.**

1Q23 COAs - # 402672665

- **Include BTEX and TPH analysis with the "if no indication of a release is present" proposed parameters.**

Historical data was previously presented in the appendix. It has now been merged into the current analytical results. The BTEX and TPH results are shown in Table 1. All samples analyzed for BTEX and TPH had results below laboratory detection limits.

2Q23 COAs - #403510714

- **In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule. ECMC selected Quarterly under Remediation Progress Update.**

FEM has adopted a quarterly reporting schedule and will provide updates to the ECMC in quarterly Form 27 reports.

- **Operator shall indicate if the flowlines at this location will be abandoned-in-place or removed. Additional soil sampling and documentation may be required depending on the Operators plan with the flowlines. Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.**

FEM acknowledges this COA and is working to determine the status of the flowline on site. If warranted, additional sampling results and information will be provided to the ECMC in quarterly Form 27 updates.

- **Operator shall submit the analytics results from the wellhead in the supplemental Form 27 submittal.**

The wellhead analytical results were previously shown in the historical tables in the appendix. The historical results have since been added to the current analytical results (Tables 1-2) to consolidate the data and clear any confusion. All analytical results for the Wellhead sample were within ECMC Standards

- **Closure Request removed. Per Doc# 402672665, a reduced sampling plan of BTEX, TPH, pH, SAR, EC, boron, naphthalene, 1,2,3 and 1,2,4 trimethylbenzene was approved if no evidence of a release was discovered. If a release was discovered, then full Table 915-1 would be analyzed. The arsenic and barium analytical results located at sample locations "Separator @ 12- 24" - Groseclose", "Tank @ 12-24" - Groseclose", "HA-1 @ 12-24" - Groseclose", "HA-2 @ 12-24" - Groseclose", and "HA-3 @ 12-24" - Groseclose" exceed Table 915-1: Metals in Soil SSLs and Operator did not collect a background sample, so there is no evidence that arsenic and barium exceedances are native to this Site. Per Doc# 402672665, "A background sample will also be collected" but a background sample was not collected. Operator shall collect and analyze all sample locations for full Table 915-1 and provide the analytical results (historic and new) within the next Form 27 submittal.**

All samples analyzed were below the laboratory detection limit for VOCs. There were also no soil suitability exceedances in the last sampling period. The historical and current results have been merged into Tables 1-2 to consolidate the data. Due to nearby monitoring well depths to water (Figure 3) and the site lithology, FEM is requesting to adhere to Residential Standards. The only exceedances above Residential Standards were for arsenic (0.891-1.09 mg/kg). Colorado arsenic guidelines show background arsenic concentrations for Colorado native grassland, rangeland, or agriculture at 3-14 mg/kg (Appendix A).

- **Operator shall mark "YES" to the question "Is surface water within ¼ mile?" since an intermittent tributary of Sand creek is 0.22 miles north of the site.**

The box will be marked during the next submission with the pertinent information.

- **Operator shall provide justification for use of Residential SSL including but not limited to depth to groundwater and the local lithology.**

The site topography is level across the site and the lithology is typical for the eastern plains and consistent onsite composed primarily of dry, clayey sand to sandy clay. Groundwater has not been encountered onsite and an online DWR investigation into nearby monitoring wells showed depths to groundwater at over 200 feet. FEM is requesting Residential Soil Standards.