

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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403620622

Receive Date:

12/11/2023

Report taken by:

Krystal Heibel

## 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>
Contact Person: <u>Sydney Smith</u>	Email: <u>ssmith@fundareresources.com</u>	Mobile: <u>( )</u>

## PROJECT, PURPOSE &amp; 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? Yes \_\_\_\_\_

Is groundwater less than 20 feet below ground surface? No \_\_\_\_\_

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

A review of Colorado's DWR Well Permit Resource data identified one (1) geophysical log well approximately 410 feet southeast from the Site. The indicating depth to non-alluvial groundwater based on this well is 104 feet bgs. Surface water is present in the area in the form of ephemeral streams and small reservoirs, but notable drainages are more than ¼ mile from the Site. There are no residence within a quarter mile. Mule Deer severe winter range is within a quarter mile buffer and CPW was notified of the release.

## 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	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 4th quarter 2023 Soil samples were collected during the installation of the new monitoring well MW-7. During drilling soil was screened and a soil sample was collected from the location with highest recorded PID. Soil samples were collected and analyzed for full table 915-1 constituents. Analytical result indicated all Organic constituents at MW-7@45-47.5 were below table 915 limits. All other analytes were below Table 915-1 soil to groundwater limits, except for Arsenic, Barium, SAR, and PH. Backgrounds have not been collected at the site, therefore it can not be determined if impacts are related to the release or are naturally occurring. However, Based upon an analytical review from surrounding sites, and the Groundwater analytical data inorganic exceedances are consistent with background.

#### 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 sites that includes gauging and sampling all the monitor wells that do not contain phase separated hydrocarbons (PSH). Groundwater samples will be analyzed for Full Table 915-1, groundwater constituents. The Install of the additional groundwater monitoring well was completed during the 4th quarter of 2023. Groundwater results for MW-1 through MW-6 remain consistent and are attached. Groundwater analytical results from the new well indicated that the extent of impacts have been laterally defined. Groundwater monitoring on a quarterly basis will continue.

#### 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 ):

Fundare will continue quarterly groundwater monitoring efforts, and utilize data from upcoming quarters to formulate a plan for continued remediation.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 42

Number of soil samples exceeding 915-1 5

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

Approximate areal extent (square feet) 10000

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

NA Highest concentration of SAR

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 35

#### Groundwater

Number of groundwater samples collected 42

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 49

Number of groundwater monitoring wells installed 7

Number of groundwater samples exceeding 915-1 17

-- Highest concentration of Benzene (µg/l) 5500

-- Highest concentration of Toluene (µg/l) 8600

-- Highest concentration of Ethylbenzene (µg/l) 1900

-- Highest concentration of Xylene (µg/l) 4800

NA Highest concentration of Methane (mg/l)

#### Surface Water

0 Number of surface water samples collected

0 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) 3

Volume of liquid waste (barrels) 2

☒ Is further site investigation required?

An additional monitoring well was installed in accordance with the COAs and 915 guidance to define the extent of the impacts. Groundwater monitoring on a quarterly basis will continue to take place, and analytical data collected will assist investigation and continued remediation.

### REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

#### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soils were excavated to a depth of 20 feet below ground surface (bgs) and remediated on site. Impacted soils continued deeper than 20 feet bgs and beyond what could be safely excavated. so it was determined remediated would commence in-situ. Stockpiled soils from the excavation were sampled and used to backfill the excavation. Six (6) groundwater monitoring wells have been installed.

#### 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.

The installation of an additional monitoring well to further define the extent of impacts was completed during the 4th quarter of 2023. Inorganic exceedances were present in the soil to groundwater interface. However, Based upon an analytical review from surrounding sites, and the Groundwater analytical data, inorganic exceedances are consistent with background and are not present within groundwater. There is no further soil remediation proposed, and Groundwater monitoring will continue on a quarterly basis

#### Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation ( or enhanced bioremediation )

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 300

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

Quarterly monitoring will continue to occur and samples will be analyzed for full table 915-1 groundwater constituents. Analytical results are attached in the provided monitoring report, and analytical results for the new monitoring wells are in a separate attachment.

## 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.

Fundare Resources has the following listed bonds in place with the COGCC.

20210060 ACTIVE SURFACE \$25,000.00 BLANKET 8/31/2021 INSURANCE B013680

20210061 ACTIVE PLUGGING \$100,000.00 BLANKET 8/31/2021 INSURANCE B013670

20210062 ACTIVE GAS FACILITY \$50,000.00 BLANKET 8/31/2021 INSURANCE B013675

20210063 ACTIVE PLUGGING \$240,000.00 EXCESS INACTIVE 8/31/2021 INSURANCE B013671

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 2

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.

A reclamation plan will be prepared pending the outcome of site and remediation investigation.

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. 10/21/2019

### 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. 06/30/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/01/2023

Proposed date of completion of Remediation. 07/01/2026

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 27 is being submitted sharing the results of the 4th quarter monitoring of 2023. The additional monitoring been installed to define the extent of impacts, and Fundare is proposing continued quarterly monitoring. Fundare will continue Quarterly groundwater monitoring to assist in further investigation and remediation. A drafted boring log, which includes well construction details is provided in the attachments, along with an updated well location map.

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: 12/11/2023

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: Krystal Heibel

Date: 01/23/2024

Remediation Project Number: 15397

**COA Type****Description**

0 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**

403620622	FORM 27-SUPPLEMENTAL-SUBMITTED
403621069	ANALYTICAL RESULTS
403621071	ANALYTICAL RESULTS
403621073	ANALYTICAL RESULTS
403621074	ANALYTICAL RESULTS
403621105	LOGS
403621112	OTHER
403621156	MONITORING REPORT
403621158	GROUND WATER SAMPLE LOCATION

Total Attach: 9 Files

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

Environmental	" Soil samples were collected and analyzed for full table 915-1 constituents. Analytical result indicated all Organic constituents at MW-7@45-47.5 were below table 915 limits. All other analytes were below Table 915-1 soil to groundwater limits, except for Arsenic, Barium, SAR, and PH."	01/23/2024
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Total: 1 comment(s)