

State of Colorado
Energy & Carbon Management Commission

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403834860
Receive Date:
09/26/2024
Report taken by:
Chris Sanchez

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 ECMC 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>(832) 948-4476</u>
City: <u>OKLAHOMA CITY</u> State: <u>OK</u> Zip: <u>73102</u>		Mobile: <u>(832) 948-4476</u>
Contact Person: <u>Christopher Bear</u>	Email: <u>christopher.bear@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>No</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>No</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	Approximately 1,700 ft ²	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.

Energy & Carbon Management Commission (ECMC) Form 27 Document 402979959 was submitted to open Remediation Project 22832 for site investigation associated with the APACHE CANYON 6-9V (API# 05-071-09126) well plugging and abandonment (P&A) and associated pit closure (ECMC 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):

Groundwater was not encountered during site investigation activities.

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 17

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

Approximate areal extent (square feet) 1700

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?

Fifteen background samples were collected on July 7, October 6, December 1, 2022 and May 28, 2024. See the attached ROWC for details.

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. XTO plans to request to leave elevated inorganics in place via a 915.b. Reclamation Plan.

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.

For site investigation details prior to 2024, please see the ROWC associated with Document 403683903.

On May 28, 2024, additional recharacterization samples were collected from previously impacted sample locations to address the Conditions of Approval (COAs) in Form 27 Document 403364196. Three recharacterization samples (CS2, CS4, and CS5) were collected from the historic pit from depths ranging from 7 to 13.5 feet below ground surface (bgs), one (CS11) was collected from the former wellhead location at 4 feet bgs, and three (CS8, CS10 and CS12) were collected from former flowline connection locations at depths ranging from 2.5 to 4.5 feet bgs. Two composite soil samples were collected from the stockpile to recharacterize levels of TPH and arsenic. Additionally, three background soil samples were collected from nearby, native, non-impacted soil to further characterize native levels of inorganic constituents of concern at the Location. Analytical results of pit recharacterization sample CS2 did not detect hexavalent chromium above the laboratory detection limit. Samples CS4 and CS5 exceeded the RSSL for arsenic at 2.65 and 3.66 milligrams per kilogram (mg/kg), respectively, though a reanalysis of CS5 established a concentration of 1.73 mg/kg. Analytical results did not detect hexavalent chromium above the laboratory detection limit in any of the recharacterization samples. Analytical results of the stockpile samples were within the Table 915-1 RSSL for TPH and exceeded the allowable limit for arsenic at values of 2.69 and 4.17 mg/kg, though a reanalysis of the STOCK02 composite sample established a concentration of 3.28 mg/kg in place of the previous 4.17 mg/kg value. Analytical results of background soil samples indicate a native arsenic value of 2.76 mg/kg. In accordance with Table 915-1 Footnote 11, using a factor of 1.25 X 2.76 mg/kg, XTO requests an alternative allowable limit of 3.45 mg/kg for arsenic. See the attached ROWC for additional 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 ECMC 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. If groundwater is encountered during site investigation activities, XTO will attempt to collect a sample for analysis.

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 Closure 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 / 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 _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC 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? 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 ECMC 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 ECMC 1000 Series Rules. 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. 05/28/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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 metal recharacterization and background sampling and request closure of Remediation Project 22832. See the attached ROWC and 915.b Reclamation Plan for additional details.

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

Signed: Christopher Bear

Title: Project Manager

Submit Date: 09/26/2024

Email: christopher.bear@exxonmobil.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Chris Sanchez

Date: 01/09/2025

Remediation Project Number: 22832

COA Type**Description**

	Based on the information presented, it appears that no further remedial action is necessary at this time and the ECMC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.
	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements
2 COAs	

ATTACHMENT 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**

403834860	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403936217	SITE INVESTIGATION REPORT
403936220	RECLAMATION PLAN
404053844	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

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

Environmental	This Form 27 is being approved at this time, for future submittals the Operator shall submit Analytical Lab Reports, Photo Logs and Tables as standalone PDFs.	01/09/2025
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Total: 1 comment(s)