

State of Colorado Oil and Gas Conservation Commission

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401490865

Receive Date:

12/19/2017

Report taken by:

Stan Spencer

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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATION

Name of Operator: <u>UTAH GAS OP LTD DBA UTAH GAS CORP</u>	Operator No: <u>10539</u>	Phone Numbers
Address: <u>1125 ESCALANTE DR</u>		Phone: <u>(970) 9019007</u>
City: <u>RANGELY</u>	State: <u>CO</u>	Zip: <u>81648</u>
Contact Person: <u>Matt Kasten</u>	Email: <u>mattkasten@dirco.info</u>	Mobile: <u>(970) 9019007</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10517Initial Form 27 Document #: 401409106

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste | <input type="checkbox"/> Rule 906.c.: Director request |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____ |

SITE INFORMATION

N Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>PIT</u>	Facility ID: <u>111221</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>YOUNG CATTLE CO. 24-12 24NWSW</u>		Latitude: <u>39.524293</u>	Longitude: <u>-108.946472</u>
		** correct Lat/Long if needed: Latitude: <u>39.523340</u>	Longitude: <u>-108.946500</u>
QtrQtr: <u>NWSW</u>	Sec: <u>24</u>	Twp: <u>6S</u>	Range: <u>104W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SCMost Sensitive Adjacent Land Use Non-Crop LandIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

*Sensitive area based on distance (~60') to a GIS identified surface water resource. However, this is a dry/intermittent drainage and no ground water has been noted within 100' of surface.

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	Unknown	NA-Need to delineate

INITIAL ACTION SUMMARY

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

Location has been shut in since 2016. Location was inspected June 2017 and release had not occurred. Tank had less than 20bbl and during last inspection, visual staining was identified and tank had corrosion on bottom sides. Unable to tell if bottom has corrosion but tank is scheduled to be removed. Secondary liner failed at dump line due to tear in bottom. Liner will be removed for remediation also.

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):

Grab samples will be collected during excavation to delineate release area. Stockpile will also be sampled via composite for landfill disposal. Grab samples will be collected at the bottom and four side walls to prove delineation.

Proposed Groundwater Sampling

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

Ground water is not expected to be found during excavation. If so, monitoring wells will be drilled by a 3rd party contractor to delineate impacts. A supplemental Form 27 will be submitted before drilling for approval.

Proposed Surface Water Sampling

☐ Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

No surface water receptors will be effected by release.

Additional Investigative Actions

☒ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

The release will be excavated by heavy machinery to begin. If first approach is successful then impacted material will be hauled to an approved landfill under manifest or if impacts are close to 910.1 the material might be subject to be landfarmed on-site. If the material is going to be landfarmed, a supplemental Form 27 will be submitted for approval. If heavy equipment is unsatisfactory, a drill rig will be contracted to delineate and then might be switched to in-situ. Before drilling a supplemental Form 27 will be submitted for approval.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7

Number of soil samples exceeding 910-1 1

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

Approximate areal extent (square feet) 400

NA / ND

-- Highest concentration of TPH (mg/kg) 1043

-- Highest concentration of SAR 7.99

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 910-1

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

0 Number of surface water samples exceeding 910-1

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)

Volume of liquid waste (barrels)

☒ Is further site investigation required?

See Attached:

The site will be excavated after tank and piping are removed. If additional investigation is required beyond heavy equipment, a supplemental Form 27 will demonstrate our efforts along with an new remediation approach.

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.

See New Attached:

Impacted soils will be removed by heavy equipment.

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.

See New Attached:

It is unknown right now the date that the tank will be removed. Mid October to begin excavation is the initial plan.

If impacted soils are transported to landfill the scope of the project will not take more than a month to dispose and be completed from the start of excavation.

If impacts are going to be landfarmed, an estimated time of 2 months will be the initial start to see if impacts are reducing quickly.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

☐ Ex Situ

_____ Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) _____

Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Excavate and onsite remediation

_____ No Land Treatment

_____ No Bioremediation (or enhanced bioremediation)

_____ No Chemical oxidation

_____ No Other _____

Groundwater Remediation Summary

_____ No Bioremediation (or enhanced bioremediation)

_____ No Chemical oxidation

_____ No Air sparge / Soil vapor extraction

_____ No 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.

NA

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other NFA is goal for first month, will update if REM plan changes.

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Form 27 closure if initial Form 27 is correct.

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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:

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

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

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface?

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

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.

After NFA is issued for Spill/Rem Closure. The excavated material will be reused for backfill.

After Remediation is complete, the tank battery will be backfilled with clean fill and the area will be likely be reused for a new tank battery/tank. Seeding will not need to take place since it is on the working surface of the pad.

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 approve the seed mix? Yes

If NO, does the seed mix comply with local soil conservation district recommendations? Yes

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/02/2017

Date of commencement of Site Investigation. 10/02/2017

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/09/2017

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. 12/26/2017

Date of completion of Reclamation. _____

OPERATOR COMMENT

Attn: Stan Spencer

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

Signed: Matt Kasten

Title: EHS Manager

Submit Date: 12/19/2017

Email: mattkasten@dirtyco.info

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: Stan Spencer

Date: 12/21/2017

Remediation Project Number: 10517

COA Type**Description**

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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**

401490865	FORM 27-SUPPLEMENTAL-SUBMITTED
401490881	REMEDATION PROGRESS REPORT
401490883	ANALYTICAL RESULTS
401490887	ANALYTICAL RESULTS
401490889	SITE MAP

Total Attach: 5 Files

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

Environmental	<p>Based on the information presented, it appears that no further remedial action is necessary and the pit can be backfilled with landfarm material that meets Table 910-1 criteria. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required. In addition, any non-working surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. When activities are complete, submit another Supplemental F-27 with a request for closure including a table showing final analyses from the pit and landfarm were Table 910-1 compliant.</p> <p>Interim reclamation on non-working surface includes; Materials with pH, SAR, or EC concentrations exceeding Table 910-1 levels may be buried under a minimum of three (3) feet of backfill cover and soil that satisfies either the Table 910-1 levels for pH, SAR, and EC or the background levels for such contaminants within three (3) feet of the ground surface at the site. In addition, soil horizons must be replaced in their original relative position and reclaimed in accordance with 1000 Series Rules, including the establishment of vegetative cover on non-cropland and successful crop growth on cropland.</p>	12/21/2017
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Total: 1 comment(s)