FORM 27 Rev 3/16

State of Colorado
Oil and Gas Conservation Commission

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Report taken by: KRIS NEIDEL

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 INFORMATON

Name of Operator: WEXPRO COMPANY Operator No: 95960
Address: P O BOX 45003
City: SALT LAKE CITY State: UT Zip: 84145-0601
Contact Person: April Stegall Email: april.stegall@dominionenergy.com

Phone Numbers
Phone: (307) 352-7561
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9779 Initial Form 27 Document #: 2526693

PURPOSE INFORMATION

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

SITE INFORMATION

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

Facility Type: PIT Facility ID: 100619 API #: County Name: MOFFAT
Facility Name: ACE UNIT 5 Latitude: Longitude:
** correct Lat/Long if needed: Latitude: 40.964980 Longitude: -108.293370
QtrQtr: Sec: Twp: Range: Meridian: Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications SC
Most Sensitive Adjacent Land Use RANGELAND, Non-cropland, Oil and Gas
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

338' FROM NATURAL DRAINAGE, 7213' FROM NEAREST WATER WELL

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [x] **E&P Waste**
  - [x] Produced Water
  - [ ] Oil
  - [ ] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [x] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [x] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	None	Visual inspection
No	SOILS	Minimal	SOIL ANALYSIS

INITIAL ACTION SUMMARY

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

Pit is closed. Pit appears to have been closed between 2011 and 2014. Background samples were not collected, please see attachments for map showing high arsenic ranges that have been tested within a mile previously.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

- [x] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

72 hour notification of core sampling was given to COGCC. Core samples were obtained using an auger attached to a skid steer, as per previously approved Form 27 (see attachments). Per Rule 910.B.3.B., one sample was taken and tested for the full Table 910-1 at the area most likely to have been impacted, and one sample was deemed to be enough to adequately characterize the pit as soil profiles were clear (see attachment). The depth of the sample was determined by visual observations during sampling (please see attachment for soil information).
Please see the attached Chain of Custody and Soil analysis labeled for Ace 5 pit (facility 100619).
Please see the attached sampling map and Google Earth imagery demonstrating that the samples obtained were located on the Ace 5 well pad.
Please see the historic Google Earth imagery showing sampling points in relations to visible pit locations.
Please see the attached sampling map for visual observations of the soil that were made during sampling.

Proposed Groundwater Sampling

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

First a visual inspection was performed, looking for signs of stained soil and any potential leeching of pit components that may have impacted surface water or groundwater, none were found.

Proposed Surface Water Sampling

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

First a visual inspection was performed, looking for signs of stained soil and any potential leeching of pit components that may have impacted surface water or groundwater, none were found.

Additional Investigative Actions

- [ ] Additional alternative investigative actions described in attached Site Investigation Plan (summary):

NA

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 1

Number of soil samples exceeeding 910-1: 1

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

Approximate areal extent (square feet): 400

NA / ND

-- Highest concentration of TPH (mg/kg): 24

-- Highest concentration of SAR: 12.2

BTEX > 910-1: No

Vertical Extent > 910-1 (in feet): 8

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?

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.

Not necessary. Arsenic was above Table 910-1 requirements (please see attachments), but it has been established that high levels of arsenic are naturally occurring in the area. SAR was above Table 910-1 requirements, but sample depth was 8', and surface revegetation will not be affected, remediation is not necessary.

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.

NA

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
  - ____ 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.

NA, not necessary.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

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

☐ Other _____

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? Yes

Do all soils meet Table 910-1 standards? No

Does the previous reply indicate consideration of background concentrations? _____

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

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.

Final reclamation of the well pad was completed after the plugging and abandonment of the well in 2002.

Is the described reclamation complete? Yes

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). 09/14/2017

Date of commencement of Site Investigation. 09/14/2017

Date of completion of Site Investigation. 09/14/2017

REMEDIAL ACTION DATES

Date of commencement of Remediation.

Date of completion of Remediation.

SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

OPERATOR COMMENT

Wexpro Company requests closure and NFA of Facility #100619 and Remediation #9779, based on the attached analytical results and site investigation.

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

Signed:` April Stegall

Title: Reclamation Agent

Submit Date:` 01/05/2018

Email: april.stegall@dominionenergy.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: KRIS NEIDEL

Date: 03/07/2018

Remediation Project Number: 9779

COA Type	Description
	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be significantly impacted, then further investigation and/or remediation activities may be required at the site.

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
401466137	FORM 27-SUPPLEMENTAL-SUBMITTED
401466178	SITE INVESTIGATION REPORT
401466180	OTHER
401466187	ANALYTICAL RESULTS

Total Attach: 4 Files

General Comments

User Group	Comment	Comment Date
Environmental	Demonstration of naturally occurring background levels of Arsenic is adequate to explain the levels of Arsenic at the site of former pit.	03/07/2018

Total: 1 comment(s)