

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



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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: <u>WEXPRO COMPANY</u>	Operator No: <u>95960</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 45003</u>		Phone: <u>(307) 352-7561</u>
City: <u>SALT LAKE CITY</u>	State: <u>UT</u>	Zip: <u>84145-0601</u>
Contact Person: <u>April Stegall</u>	Email: <u>april.stegall@dominionenergy.com</u>	Mobile: <u>(307) 371-3610</u>

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**  
Remediation Project #: 9239 Initial Form 27 Document #: 2315410

**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 checked="" 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 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 checked="" type="checkbox"/> Other <u>request for approval of remediation plan</u>

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

Facility Type: <u>PIT</u>	Facility ID: <u>100401</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>STATE 1</u>	Latitude: <u>40.910747</u>	Longitude: <u>-108.289686</u>	
	** correct Lat/Long if needed: Latitude: <u>40.918840</u>	Longitude: <u>-108.289680</u>	
QtrQtr: <u>NENE</u>	Sec: <u>16</u>	Twp: <u>11N</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

**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**

4246' from nearest water well, 792' from nearest surface water.

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |   |
|--|--|---|
| <input checked="" type="checkbox"/> <b>E&amp;P Waste</b> | <input checked="" type="checkbox"/> <b>Other E&amp;P Waste</b> | <input type="checkbox"/> <b>Non-E&amp;P Waste</b> |
| <input checked="" type="checkbox"/> Produced Water       | <input type="checkbox"/> Workover Fluids                       | _____   |
| <input type="checkbox"/> Oil                             | <input type="checkbox"/> Tank Bottoms                          |   |
| <input type="checkbox"/> Condensate                      | <input type="checkbox"/> Pigging Waste                         |   |
| <input type="checkbox"/> Drilling Fluids                 | <input type="checkbox"/> Rig Wash                              |   |
| <input type="checkbox"/> Drill Cuttings                  | <input type="checkbox"/> Spent Filters                         |   |
|  | <input checked="" type="checkbox"/> Pit Bottoms                |   |
|  | <input type="checkbox"/> Other (as described by EPA)           | _____   |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	None	Visual inspection
Yes	SOILS	Unknown	Soil analysis
No	SURFACE WATER	None	Visual inspection

## INITIAL ACTION SUMMARY

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

Pits were closed by former operator. Location of pits was determined by using historical imagery on Google Earth. Pit appears to have been closed between 2011 and 2014.

## 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 ):

Core samples were obtained using a skid steer with auger attachment in order to obtain proper documentation for pit closure, as no records have been found. Only one sample was taken because soil appeared dirty and smelled of hydrocarbons, and it was suspected that pit wouldn't meet Table 910-1 requirements. Analysis (attached) shows that the sample did not meet requirements for total TPH. Background (offsite) samples were not collected, as its been established that high levels of arsenic are naturally occurring in the area. See attachments for previously tested high levels of arsenic in the Powder Wash field.

### Proposed Groundwater Sampling

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

A visual inspection was performed looking for signs of stained soil and potential leeching of pit components that may have impacted surface or groundwater, none were found. No groundwater was encountered during sampling.

### Proposed Surface Water Sampling

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

A visual inspection was performed looking for signs of stained soil and potential leeching of pit components that may have impacted surface 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 exceeding 910-1 1

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

Approximate areal extent (square feet) 0

### NA / ND

-- Highest concentration of TPH (mg/kg) 1620

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 4

### 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

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?

Area will need to be excavated for deliniation of contamination, as described in remediation plan.

# 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.

Wexpro Company plans to excavate the contaminated pit material with equipment, specific machinery is still unknown.

## 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.

Wexpro Company will excavate the contaminated pit material with machinery, using sensory observations to determine where contamination ends. Contaminated material will be hauled and disposed of at a commercial/approved facility. Haul tickets will be made available, if wanted. One discreet sample will be taken from each sidewall and pit bottom to confirm that contamination has been removed. Analysis will be submitted in a separate Form 27 with request to backfill the pit, if analysis meets requirements. After approval has been received, Wexpro Company will backfill the excavated area using soil from the newly constructed Powder Wash evap pond, if needed. Depending upon the size of the excavated area, additional soil may not be needed, as final reclamation of the well pad hasn't taken place due to pit closure issues, and re-contouring of the area may be sufficient to backfill the pit. Please see attachments for approval from the BLM to use topsoil from the Powder Wash Evap pond within the Powder Wash area.

## Soil Remediation Summary

In Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

Ex Situ

- Yes \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 30
- \_\_\_\_\_ 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, there is no indication that groundwater has been impacted. If groundwater is encountered during excavation, COGCC will be notified immediately.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:**  Quarterly  Semi-Annually  Annually  Other Form 27's will be submitted as needed, and as work is performed.

**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? No \_\_\_\_\_

Do all soils meet Table 910-1 standards? \_\_\_\_\_

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? \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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.

Once approval has been given, Wexpro Company will backfill the excavated area and complete final reclamation of the well 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). 08/17/2017

Date of commencement of Site Investigation. \_\_\_\_\_

Date of completion of Site Investigation. \_\_\_\_\_

### **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 approval to excavate and remediate State of Colorado 1 pit (facility 100401) in 2019.

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: 01/11/2019 \_\_\_\_\_

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: 03/25/2019 \_\_\_\_\_

Remediation Project Number: 9239 \_\_\_\_\_

**COA Type****Description**

	It is understood that this project is Remediation by excavation, the pit area is not fully delineated. Careful field notes and documentation should be taken to assure all impacted material is removed and samples taken. Samples location selection should be guided by rule 910.b(3)B. The number of soil samples and their location should be adequate to characterize the impacted area.
	COGCC should be notified immediately, in the event that groundwater is encountered in investigation.
	Operator should provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-871-1963 72hrs prior to mobilization at begin of all sampling events.
	COGCC is only approving the remediation of E&P waste. All topsoil agreements are between the operator and the BLM.

**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**

401902373	FORM 27-SUPPLEMENTAL-SUBMITTED
401902474	OTHER
401902479	OTHER
401902480	SITE INVESTIGATION REPORT
401902482	ANALYTICAL RESULTS

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)