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
Mobile: (307) 371-3610

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10105 Initial Form 27 Document #: 401227509

PURPOSE INFORMATION

- [ ] 901.e. Sensitive Area Determination
- [ ] 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.
- [ ] Rule 909.e.(2)B.: Closure of remediation project
- [ ] Rule 906.c.: Director request
- [x] Other — Request approval to remediate pit after plugging and abandonment of the associated well.

SITE INFORMATION

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

Facility Type: PIT Facility ID: 100689 API #: County Name: MOFFAT
Facility Name: CARL ALLEN 9 Latitude: 40.962109 Longitude: -108.289477
** correct Lat/Long if needed: Latitude: 40.960840 Longitude: -108.288620
QtrQtr: NENE Sec: 33 Twp: 12N Range: 97W Meridian: 6 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? No
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

1480' from natural drainage, 7419' 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	See analysis	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.

Pit was previously backfilled. Historic Google Earth imagery indicates that the pit was closed sometime between 2011 and 2014.

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):

Core samples were obtained using a skid steer with auger attachment, in an attempt to obtain proper documentation for pit closure. One sample was taken as a confirmation of previous sampling results, as per previously approved site investigation plan. Analysis (attached) shows that the sample did not meet Table 910-1 requirements for total TPH, SAR and arsenic. Background (offsite) samples were not collected, as it's been previously established that high levels of arsenic are naturally occurring in the area. Please see attachments for map showing previously tested arsenic samples in the Powder Wash area. Please see attachments for GPS coordinates of sample and soil observations made during sampling.

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. Groundwater was not 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):

N/A

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? No

Approximate areal extent (square feet): 0

NA / ND

-- Highest concentration of TPH (mg/kg): 1339

-- Highest concentration of SAR: 26.3

BTEX > 910-1: No

Vertical Extent > 910-1 (in feet): 7

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?

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 will determine remediation based on size and impact upon plugging and abandonment of the associated well.

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 requests approval to leave the pit in place until plugging and abandonment of the associated well has been completed, after which the pit can be remediated without concern for the existing production facilities. This will also allow time for Wexpro Company to accrue additional funds for remediation (see ARO doc attachment). Please see attachments for pit maintenance, use and history. Please see attachments and comments for more information.

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.

N/A, there is no indication that groundwater was impacted. If groundwater is encountered during remediation, COGCC will be notified immediately.

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? No

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? No

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.

Wexpro Company requests approval to complete pit remediation and final reclamation of the well pad after plugging and abandonment of the associated well is complete.

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. 09/27/2012

Actual Spill or Release date, if known.

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date).

Date of commencement of Site Investigation. 06/29/2012

Date of completion of Site Investigation. 09/08/2017

REMEDIAL ACTION DATES

Date of commencement of Remediation.

Date of completion of Remediation.

SITE RECLAMATION DATES

Date of commencement of Reclamation. 06/29/2012

Date of completion of Reclamation. 06/30/2012

OPERATOR COMMENT

Wexpro Company requests approval to leave the pit in place until after the plugging and abandonment of the associated well is complete, after which the pit can be remediated without concern for the existing production facilities and funds can be accrued for remediation over time. Based on economics and gas reserves, Wexpro Company estimates the remaining life of the well to be approximately 15 years. Well is Federal surface and minerals and is not within any sensitive wildlife habitat. Please see attachments.

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:` 02/14/2019 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: 05/16/2019

Remediation Project Number: 10105

COA Type	Description
	Within 90-days of approval of this F27, provide a Supplemental F27 outlining how the Operator will be delineating the vertical and horizontal extent of contamination.
	It is stated: "Wexpro Company requests approval to leave historic pit in place until plugging and abandonment of the well has been completed, after which the pit can be remediated without concern of existing production facilities. Based on economics and gas reserves, Wexpro Company estimates the remaining life of the well to be 15 years." In order for the COGCC to consider leaving E&P waste in place near the historic spill over the next 15 years, the vertical and horizontal extent of impact SHALL be delineated.

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
401939506	FORM 27-SUPPLEMENTAL-SUBMITTED
401939533	SITE INVESTIGATION REPORT
401939535	ANALYTICAL RESULTS
401939538	OTHER
401939540	OTHER

Total Attach: 5 Files

General Comments

User Group	Comment	Comment Date
Environmental	In-Situ remedial efforts such as chemical oxidation can be performed in and around the existing production facilities.	05/16/2019

Total: 1 comment(s)