FORM 27 Rev 3/16

State of Colorado
Oil and Gas Conservation Commission

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

Document Number: 402036066
Receive Date: 05/08/2019
Report taken by: John Heil

Site Investigation and Remediation Workplan (Initial 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: UTAH GAS OP LTD DBA UTAH GAS CORP Operator No: 10539
Address: 1125 ESCALANTE DR
City: RANGELY State: CO Zip: 81648
Contact Person: Steve Hale Email: shale@utahgascorp.com

Phone Numbers
Phone: (970) 2902912
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 13715 Initial Form 27 Document #: 402036066

PURPOSE INFORMATION

- [ ] 901.e. Sensitive Area Determination
- [ ] 909.c.(1), Rule 905: Pit or PW vessel closure
- [x] 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
- [ ] Other

SITE INFORMATION

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

Facility Type: LOCATION Facility ID: 314293 API #: County Name: RIO BLANCO
Facility Name: DOUGLAS CREEK UNIT-63S101W 5NWSW Latitude: 39.815380 Longitude: -108.762529
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NWSW Sec: 5 Twp: 3S Range: 101W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Livestock
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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

  Produced water from injection well

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	TBD	Soil sampling

INITIAL ACTION SUMMARY

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

Release surfaced just above pipeline elbow, which is 6' bgs. Injection well was shut in and excavation began to locate failure point in pipeline. Release stayed on working surface and pooled in stormwater bmp retention pond.

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 have already been collected but vertical extent has not been determined. Addtional sampling will occur to delineate.

Proposed Groundwater Sampling

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

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):

Follow up samples will occur within next week.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected	5	--	Highest concentration of TPH (mg/kg) 208.44
Number of soil samples exceeeding 910-1	3	--	Highest concentration of SAR 28.6
Was the areal and vertical extent of soil contamination delineated?	No		BTEX > 910-1 Yes
Approximate areal extent (square feet)	200		Vertical Extent > 910-1 (in feet) 6

Groundwater

Number of groundwater samples collected	0	NA	Highest concentration of Benzene (µg/l)
Was extent of groundwater contaminated delineated?	No	NA	Highest concentration of Toluene (µg/l)
Depth to groundwater (below ground surface, in feet)	60`	NA	Highest concentration of Ethylbenzene (µg/l)
Number of groundwater monitoring wells installed	0	NA	Highest concentration of Xylene (µg/l)
Number of groundwater samples exceeding 910-1	0	NA	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) 20 Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Vertical sampling to verify extent below failure point to occur next week.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Source was removed using heavy equipment and hauled via dump truck.

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.

Additional sampling to verify clearance will be collected in the next week. If samples prove clearance, NFA will be requested. IF impacts are identified, addtional excavation and/or drilling will be used. After lab results are back in from new sampling, Utah gas will determine best route for next steps.

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) 20
  - Name of Licensed Disposal Facility or COGCC Facility ID # ____
- No Excavate and onsite remediation
  - ____ Land Treatment
  - ____ Bioremediation (or enhanced bioremediation)
  - ____ Chemical oxidation
  - ____ 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.

Ground water is not expected to be located and was not located during intial excavation. If ground water is encountered, a 3rd party consultant will be contracted to drill and delineate.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Following sampling and/or heavy equipment work

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? 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:

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.

release path occured on working surface and bgs at elbow point. excavation had ben backfilled and recountoured to pad working surface. No seeding was needed for project.

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). 12/18/2018

Date of commencement of Site Investigation. 12/18/2018

Date of completion of Site Investigation.

REMEDIAL ACTION DATES

Date of commencement of Remediation. 12/18/2018

Date of completion of Remediation.

SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

OPERATOR COMMENT

Attn: John Heil

Spill 459792 Will be requested for closure after REM # is established. Additional sampling to determine vertical delineation will occur in next week.

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

Signed:` Steve Hale Title: Env. Specialist

Submit Date:` 05/08/2019 Email: shale@utahgascorp.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: John Heil Date: 06/10/2019

Remediation Project Number: 13715

COA Type	Description
	Comply with COAs listed on Supplemental F19 Doc# 401909409.

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
402036066	FORM 27-INITIAL-SUBMITTED
402036141	ANALYTICAL RESULTS
402036142	AERIAL IMAGE
402036144	ANALYTICAL RESULTS
402036146	ANALYTICAL RESULTS
402036148	AERIAL IMAGE
402036150	SOIL SAMPLE LOCATION MAP

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)