

# State of Colorado Oil and Gas Conservation Commission

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Receive Date:

07/10/2019

Report taken by:

ALEX FISCHER

## 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>	<b>Phone Numbers</b> Phone: <u>(970) 2902912</u> Mobile: <u>( )</u>
Address: <u>1125 ESCALANTE DR</u>		
City: <u>RANGELY</u>	State: <u>CO</u> Zip: <u>81648</u>	
Contact Person: <u>Steve Hale</u>	Email: <u>shale@utahgascorp.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

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

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

#### SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use LivestockIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? YesIs 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

☐ Other E&P Waste

☒ Non-E&P Waste

☐ Produced Water

☐ Workover Fluids

Produced water from injection well

☐ 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	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 ):

\*Update: Vertical samples collected @ 8' to demonstrate extent. No impacts found.  
Grab samples have already been collected but vertical extent has not been determined. Additional 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 10

Number of soil samples exceeding 910-1 3

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

Approximate areal extent (square feet) 200

### NA / ND

--            Highest concentration of TPH (mg/kg) 208.4  
           4

--            Highest concentration of SAR 28.6

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 6

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 60'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

NA            Highest concentration of Benzene (µg/l)           

NA            Highest concentration of Toluene (µg/l)           

NA            Highest concentration of Ethylbenzene (µg/l)           

NA            Highest concentration of Xylene (µg/l)           

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 and surface samples collected to demonstrate levels of concentration below table 910-1.  
Vertical sampling to verify extent below failure point to occur next week.

## 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.

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.

Vertical and surface samples collected. All below 910-1.  
Additional sampling to verify clearance will be collected in the next week. If samples prove clearance, NFA will be requested. IF impacts are identified, additional 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 initial excavation. If ground water is encountered, a 3rd party consultant will be contracted to drill and delineate.

## REMEDATION 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: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

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.

release path occurred on working surface and bgs at elbow point. excavation had ben backfilled and recontoured 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. 12/18/2018

### **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. 06/26/2019

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 12/18/2018

Date of completion of Remediation. 06/26/2019

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

NFA/Closure request of REM 13715  
Additional samples collected and attached to submittal form

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: 07/10/2019

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: 07/24/2019

Remediation Project Number: 13715

**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. The data presented indicate that there are 910-1 exceedance for SAR/EC/pH. If groundwater is found to be significantly impacted, or if re-vegetation is not sufficient after reclamation, additional remediation activities may be required at the site.
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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**

402101893	FORM 27-SUPPLEMENTAL-SUBMITTED
402101912	SOIL SAMPLE LOCATION MAP
402101913	ANALYTICAL RESULTS
402101914	ANALYTICAL RESULTS
402101915	ANALYTICAL RESULTS
402101917	ANALYTICAL RESULTS
402101918	ANALYTICAL RESULTS

Total Attach: 7 Files

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

Environmental	For future exceedance is inorganics, request formal relief under FAQ 31 and 32.	07/24/2019
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Total: 1 comment(s)