

State of Colorado  
Oil and Gas Conservation Commission

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Receive Date:  
09/28/2020  
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 INFORMATION

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

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**  
Remediation Project #: 8641 Initial Form 27 Document #: 2141609

**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>PIT</u>	Facility ID: <u>100611</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>JACKS DRAW UNIT 13</u>	Latitude: <u>40.983888</u>	Longitude: <u>-108.284687</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSW</u>	Sec: <u>22</u>	Twp: <u>12N</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

**SITE CONDITIONS**

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use RANGELAND

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**

NATURAL DRAINAGE APPROXIMATELY 80' FROM WELL PAD.

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input checked="" type="checkbox"/> Other E&P Waste  | <input type="checkbox"/> Non-E&P Waste |
| <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	See analysis	SOIL ANALYSIS TO BE PERFORMED
Yes	SURFACE WATER	NONE	VISUAL - LOCATION BELOW DRAINAGE

## INITIAL ACTION SUMMARY

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

VISUAL INSPECTION. SOIL ANALYSIS WILL BE OBTAINED PER TABLE 910-1. SAMPLE LOCATIONS WILL BE GUIDED BY RULE 910.B.(3)B. FENCING WILL REMAIN IN PLACE TO PREVENT INTRUSION BY STOCK OR WILDLIFE. SURFACE OWNER (BLM) WILL BE NOTIFIED OF SAMPLE RESULTS.

## 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 ):

Please see the attachment for soil analysis from samples obtained in 2020.

### Proposed Groundwater Sampling

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

No groundwater has been encountered during sampling. If groundwater is encountered during remediation, COGCC will be notified immediately.

### 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 ):

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 3  
Number of soil samples exceeding 910-1 3  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 460

### NA / ND

--          Highest concentration of TPH (mg/kg) 1300  
--          Highest concentration of SAR 104  
         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  
         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?

Delineation has not been performed. Wexpro Company proposes that delineation of the pit be completed as contaminated soils are removed.

# 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 proposes to remove the contaminated soil from this pit by excavation (most likely backhoe) and haul to an approved disposal facility, as the last round of sampling does not meet Table 910-1 standards, please see attachment.

## REMEDICATION 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 delineate the contamination of this pit while excavating soils to be hauled to an approved facility. If possible, a PID meter will be used to periodically gauge whether or not the contamination has been removed during excavation. If no PID is available, Wexpro Company will re-sample the excavated area after it is believed that all contamination has been removed, for confirmation. Wexpro Company will test the excavated area for all Table 910-1 constituents, with the exception of: EC, SAR and arsenic, as contamination is below 3 feet and will not affect the root zone, so remediation of EC and SAR impacts are not needed and it has been previously proven that the area has naturally high levels of arsenic. Soil analysis of the excavated area will be submitted with request for closure before the pit is backfilled. The pit will be fenced until approval to backfill has been received, so as to prevent intrusion from wildlife and livestock. The BLM (surface owner) will be notified of this plan, and excavation will begin, weather permitting, once all agency approvals have been received.

## 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) \_\_\_\_\_ 0  
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. Groundwater has not been encountered during sampling and previous remediation activities. If groundwater is encountered during excavation, COGCC will be notified immediately.

# REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

**Frequency:**  Quarterly  Semi-Annually  Annually  Other As work is completed.

**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? 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.

The pit will be backfilled to grade upon approval of soil analysis that meets Table 910-1 requirements. Final reclamation of the previously P&A'd well pad will be completed after approval to backfill the pit.

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). \_\_\_\_\_

Date of commencement of Site Investigation. 08/25/2020

Date of completion of Site Investigation. 08/25/2020

## **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 delineate the contamination of this pit while excavating soils to be hauled to an approved facility. If possible, a PID meter will be used to periodically gauge whether or not the contamination has been removed during excavation. If no PID is available, Wexpro Company will re-sample the excavated area after it is believed that all contamination has been removed, for confirmation. Wexpro Company will test the excavated area for all Table 910-1 constituents, with the exception of: EC, SAR and arsenic, as contamination is below 3 feet and will not affect the root zone, so remediation of EC and SAR impacts are not needed and it has been previously proven that the area has naturally high levels of arsenic. Soil analysis of the excavated area will be submitted with request for closure before the pit is backfilled. The pit will be fenced until approval to backfill has been received, so as to prevent intrusion from wildlife and livestock. The BLM (surface owner) will be notified of this plan, and excavation will begin, weather permitting, once all agency approvals have been received. Other remediation options were considered, but deemed too costly and time consuming, as this pit is on a P&A'd well pad, and final reclamation has not been completed, as final reclamation can't take place until the pit is closed.

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: 09/28/2020 \_\_\_\_\_

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: 09/29/2020 \_\_\_\_\_

Remediation Project Number: 8641 \_\_\_\_\_

**COA Type****Description**

	Request to not sample inorganics is denied. A minimum of one confirmation sample shall be for full table 910-1.
	On a supplemental Form 27, include updated Lat/Long for pit location.
	Dig and Haul method of remediation is approved, volume of soil removed shall be reported on a supplemental Form 27.
	This Site Investigation and Remediation Workplan (Form 27) is conditionally approved; however, additional information or activities may be required during the course of remediation.

**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**

402498773	FORM 27-SUPPLEMENTAL-SUBMITTED
402498789	SITE INVESTIGATION REPORT
402498791	ANALYTICAL RESULTS

Total Attach: 3 Files

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

Environmental	Due to the nature of contamination (No volatiles), use of the PID for field screening may not be helpful.	09/28/2020
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Total: 1 comment(s)