

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

09/11/2020

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> | Phone Numbers |
| 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 #: 8693 Initial Form 27 Document #: 2142210

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 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>Submittal of plan to complete delineation and remedial action plan</u> |

SITE INFORMATION

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

| | | | |
|--------------------------------------|---|-------------------------------|----------------------------|
| Facility Type: <u>PIT</u> | Facility ID: <u>100349</u> | API #: _____ | County Name: <u>MOFFAT</u> |
| Facility Name: <u>B.W. MUSSER 18</u> | Latitude: <u>40.943853</u> | Longitude: <u>-108.289630</u> | |
| | ** correct Lat/Long if needed: Latitude: <u>40.943870</u> | Longitude: <u>-108.289630</u> | |
| QtrQtr: <u>SENE</u> | Sec: <u>4</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

5351' from nearest water well, 395' from nearest surface water.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- ☒ **E&P Waste** ☒ **Other E&P Waste** ☐ **Non-E&P Waste**
- ☒ Produced Water ☐ Workover Fluids
- ☐ 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 |
|-----------|----------------|------------------|-------------------|
| No | GROUNDWATER | None | Visual inspection |
| Yes | 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 pit was closed some time 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):

Please see the attachment for proposed soil 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 previous sampling. If groundwater is encountered during delineation or 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):

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 5

Number of soil samples exceeding 910-1 1

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

Approximate areal extent (square feet) 831

NA / ND

-- Highest concentration of TPH (mg/kg) 6040

-- Highest concentration of SAR 5.79

BTEX > 910-1 Yes

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?

Based on analytical results, horizontal impacted soil delineation is considered complete. Vertically impacted soil delineation is considered incomplete because soil impacts were encountered to the depth of refusal in the center borehole and bedrock was not recovered to confirm refusal occurred at bedrock surface. Please see the attached plan for completion of delineation.

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.

Please see the attached remedial action plan for remedial options. It has been recommended that delineation be completed before choosing a remediation practice to better understand the full content of contamination.

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.

The top two remedial option candidates include in situ soil vapor extraction (SVE) and SVE with in situ soil heating. It has been recommended that additional soil data be gathered prior to final selection of remedial technology to be implemented. Please see the attached remedial action plan and plan to complete delineation for more information.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
Yes _____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
Yes _____ Other _____ SVE with in situ soil heating

☐ 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 has been impacted. If groundwater is encountered during remediation, COGCC will be notified immediately.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Wexpro will follow COGCC recommendations for reporting.

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☒ O&M Report

☒ Other SVE system _____

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.

To be determined after delineation and remediation have been completed.
Reclamation will follow COGCC and BLM guidelines.

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? _____

If NO, does the seed mix comply with local soil conservation district recommendations? _____

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. 08/10/2017 _____

Date of completion of Site Investigation. 08/10/2017 _____

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 complete the delineation of pit 100349, as per the attached plan. After delineation has been completed and impacts have been fully identified, Wexpro Company requests approval to complete remediation, per the attached RAP.

Pit 100349 is recommended to be remediated after the first stage (pilot study) of this plan. Please see the attached plan for more information. It is expected that work will be begin by Spring of 2021. Exact schedule will be determined based on severity and duration of winter weather, drilling contractor availability, wildlife stipulations, and receiving approval/right-of-way amendments from surface owners for off-site drilling.

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: 09/11/2020

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: 03/02/2021

Remediation Project Number: 8693

COA Type**Description**

| | |
|--|--|
| | It is stated, "Most of the SAR and/or EC exceedances are for depths greater than 4 ft bgs (i.e., below the root zone) and will not require remediation. " Inorganics shall be delineated regardless of depth below ground. |
| | Per Rule 915.f, if the remediation project is not completed by January 15, 2022, then the Operator will comply with the current version of Table 915-1. |
| | Per Rule 913.e. Quarterly updates shall be submitted until project is closed. |

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**

| | |
|-----------|--------------------------------|
| 402487503 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 402487519 | REMEDIAL ACTION PLAN |

Total Attach: 2 Files

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

| | | |
|---------------|---|------------|
| Environmental | Vertical depth of impact not yet defined. | 03/02/2021 |
|---------------|---|------------|

Total: 1 comment(s)