

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402487522  
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>	<b>Phone Numbers</b>
Address: <u>P O BOX 45003</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>	
		Phone: <u>(307) 352-7561</u>
		Mobile: <u>(307) 371-3610</u>

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**

Remediation Project #: 10146 Initial Form 27 Document #: 401249495

**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>100666</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>CARL ALLEN 2</u>	Latitude: <u>40.962018</u>	Longitude: <u>-108.323058</u>	
	** correct Lat/Long if needed: Latitude: <u>40.962630</u>	Longitude: <u>-108.322660</u>	
QtrQtr: <u>NWNW</u>	Sec: <u>32</u>	Twp: <u>12N</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? No

Is groundwater less than 20 feet below ground surface? No

**Other Potential Receptors within 1/4 mile**

2752' from surface water, 3830' from nearest water well.  
Pit is actually located on the Carl Allen 20 well pad, but is mislabeled, as determined by earlier investigations.

# 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
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 2006 and 2011.

## 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 water 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 water 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 4

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 5934

### NA / ND

-- Highest concentration of TPH (mg/kg) 9250

-- Highest concentration of SAR 5.97

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 12

### 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?

The analytical results for this pit represent a combination of bedrock and soil samples. Thus, determination of horizontal and vertical delineation of soil impacts is based on both soil analytical information and field measurements/observations. Based on the analytical and field screening results, horizontal soil impacts delineation is considered complete. Soil impacts are limited to soil observed in the center borehole, and these soil impacts extended from approximately 6.0 ft bgs to the bedrock surface as evidenced by bedrock recovered in the core. In most perimeter boreholes, soil cover is approximately 1.0 ft thick above bedrock. Vertical impacted soil delineation is considered complete because soil impacts were observed to extend to the bedrock surface in the center borehole; weathered bedrock was recovered at approximately 8.5 ft bgs in the center borehole. Investigation of bedrock impacts was conducted within the abilities of the drilling equipment used. As such, horizontal and vertical extent of bedrock impacts remains unresolved. Please see the attachment for plan to complete 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

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

Yes \_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

Yes \_\_\_\_\_ Other \_\_\_\_\_ SVE with in situ soil heating

\_\_\_\_\_ 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 or will be 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 completion of delineation and remediation.  
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. 04/03/2017

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 100666, 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 100666 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: 10146 \_\_\_\_\_

**COA Type****Description**

	The plan to delineate the pit is approved, schedule of remediation will be determined when delineation is complete.
	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 913.e. Quarterly updates shall be submitted until project is closed.
	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.

**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**

402487522	FORM 27-SUPPLEMENTAL-SUBMITTED
402487526	REMEDIAL ACTION PLAN

Total Attach: 2 Files

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

Environmental	Vertical depth of impact not yet defined, further investigation at sandstone bedrock is required.	03/02/2021
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Total: 1 comment(s)