

State of Colorado  
Oil and Gas Conservation Commission

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402764362  
Receive Date:  
07/30/2021

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>UTAH GAS OP LTD DBA UTAH GAS CORP</u>	Operator No: <u>10539</u>	<b>Phone Numbers</b>
Address: <u>760 HORIZON DRIVE STE 400</u>		Phone: <u>(720) 425-0303</u>
City: <u>GRAND JUNCTION</u>	State: <u>CO</u>	Zip: <u>81506</u>
Contact Person: <u>Rob Bleil</u>	Email: <u>rbleil@utahgascorp.com</u>	Mobile: <u>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19388 Initial Form 27 Document #: 402764362

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: \_\_\_\_\_

SITE INFORMATION

Yes  Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>107495</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>P.M. FEDERAL 2-6-3-103</u>	Latitude: <u>39.814239</u>	Longitude: <u>-108.996117</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>6</u>	Twp: <u>3S</u>	Range: <u>103W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>103-09695</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PMF 9010</u>	Latitude: <u>39.813590</u>	Longitude: <u>-108.998023</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>6</u>	Twp: <u>3S</u>	Range: <u>103W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: LOCATION Facility ID: 316062 API #: County Name: RIO BLANCO  
Facility Name: PMF-63S103W 6NWSE Latitude: 39.813469 Longitude: -108.997967  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: NWSE Sec: 6 Twp: 3S Range: 103W Meridian: 6 Sensitive Area? No

**SITE CONDITIONS**

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Rangeland

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**

A dry ephemeral drainage lies approximately 450 feet to the southeast, which does not currently contain any live surface water. Nearest water well (permit# 43425) is located approximately 1.56 miles to the southwest, which notes a static water of 80 feet. The elevation difference between the PMF 9010 location and groundwater well is approximately 175 feet, suggesting that groundwater is well over 100 feet deep.

# 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
UNDETERMINED	SOILS	TBD	Sampling and Analysis

## INITIAL ACTION SUMMARY

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

This form is being submitted to comply with COGCC Rule 911.a.(4) and provide initial notification of the facility closure for the Park Mountain Federal (PMF) 9010.

Initial actions will consist of site investigation actions as outlined within COGCC Rule 913.b, as well as within the proposed sampling section below.

## 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 ):

Utah Gas Corp will excavate the PMF 9010 wellhead and visually inspect the base and side walls for signs of hydrocarbon impacts. Additionally, under each piece of equipment soils will be visually inspection and field screened on the surface to 1-foot below ground surface by using hand equipment. Field screening will consist of a PID and/or Petroflag Hydrocarbon Analyzer. If field screening indicates impacts to soil, the interval containing the highest degree of impacts based on field screening will be submitted for laboratory analysis of the full list of constituents listed in COGCC Table 915-1. If results confirm that soils exceed COGCC Table 915-1, information will be provided via Supplemental Form 27 with the proposed remediation.

If field screening indicates a negative hydrocarbon presence, UGC is requesting to submit one discrete (1) sample from the areas below the equipment for a reduced analyte list consisting of TPH (DRO/GRO/ORO), BTEX and inorganic (SAR/EC/pH).

### 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 ):

Pit Facility ID: 107495 (Status Unknown). Due diligence in finding location of pit from records search and historical imagery did not identify location of pit. UGC is proposing to investigate below the tank battery location at a depth of 10' to locate historic pit. All documentation for efforts in trying to locate pit will be supplied in supplemental form 27(s).

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 0  
Number of soil samples exceeding 915-1 \_\_\_\_\_  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_

**NA / ND**

\_\_\_\_\_ Highest concentration of TPH (mg/kg) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of SAR \_\_\_\_\_  
\_\_\_\_\_ BTEX > 915-1 \_\_\_\_\_  
\_\_\_\_\_ Vertical Extent > 915-1 (in feet) \_\_\_\_\_

**Groundwater**

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 100'  
Number of groundwater monitoring wells installed \_\_\_\_\_  
Number of groundwater samples exceeding 915-1 \_\_\_\_\_

\_\_\_\_\_ 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  
0 Number of surface water samples exceeding 915-1  
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?

Three (3) background samples collected from nearby undisturbed soil and analyzed for arsenic and inorganics (SAR/EC/pH)

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?

\_\_\_\_\_

**REMEDIAL ACTION PLAN**

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

TBD - At this time there is no identified source to be removed

**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.

TBD - remediation will be based on results from the initial sampling

**Soil Remediation Summary**

In Situ

Ex Situ

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

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

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

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

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

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

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

\_\_\_\_ 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.

Groundwater impacts are not anticipated at this time

## **REMEDIATION PROGRESS UPDATE**

### **PERIODIC REPORTING**

#### **Approved Reporting Schedule:**

Quarterly     Semi-Annually     Annually     Other \_\_\_\_\_

#### **Request Alternative Reporting Schedule:**

Semi-Annually     Annually     Other \_\_\_\_\_

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

**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: \_\_\_\_\_

# 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.

Reclamation will be in conducted as outlined within the COGCC 1000 series rules and in accordance with the Bureau of Land Management (BLM) surface use agreement (SUA).

Is the described reclamation complete? \_\_\_\_\_

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim

Final

Did the Surface Owner provide the seed mix? \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

## SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. \_\_\_\_\_

Proposed date of completion of Reclamation. \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/02/2021

Proposed site investigation commencement. 08/09/2021

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

Proposed date of completion of Remediation. \_\_\_\_\_

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

## OPERATOR COMMENT

This Initial Form 27 is being submitted to provide notification of the facility closure at the Utah Gas Corp (UGC) Park Mountain Federal 9010 location and to request a REM# be assigned. Once approved, initial site investigation actions will be conducted as outlined within this Form 27. If impacts are observed under any of the described equipment, information will be provided within a Supplemental Form 27 with the proposed remediation actions.

Please note that COGIS lists a pit (facility ID 316062) associated with this location, however aerial imagery and COGCC inspections dating back to 2014 indicate no pit was ever constructed. If it is determined during facility closure operations that a pit was in fact constructed, investigation actions will consist of vertical and horizontal delineation consisting of field screening and sampling analysis. Information will be provided on a Supplemental Form 27.

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

Signed: Matt Kasten

Title: Env. Consultant

Submit Date: 07/30/2021

Email: mkasten@entradainc.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: 08/02/2021

Remediation Project Number: 19388

## Condition of Approval

### COA Type

### Description

	The operator shall ensure that any Flowlines are abandoned per rule 1105. A form 27 shall be submitted for each flowline that requires a Form 42 or Form 44.
	If an Operator discovers a Spill or Release during closure operations, the Operator will report the Spill or Release on a Form 19, Spill/Release Report, pursuant to Rule 912.
	Operator shall submit photo documentation of all field screening, soil sampling and remediation activities.
	Any observance of groundwater shall be reported to EPS staff within 24 hours. If groundwater is observed to be impacted, EPS staff shall be notified immediately.
	Operator shall comply with Rule 913.b.(2) and conduct sampling and analysis of soil and Groundwater (if encountered or a pathway to groundwater is determined) pursuant to Rule 915 to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 or in WQCC Regulation 41 numeric and narrative Groundwater quality standards and classifications, as incorporated by reference in Rule 901.b.

5 COAs

## 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

402764362	FORM 27-INITIAL-SUBMITTED
402766081	SOIL SAMPLE LOCATION MAP
402766083	MAP

Total Attach: 3 Files

## General Comments

### User Group

### Comment

### Comment Date

Environmental	COGCC approves Operator's PROPOSED SAMPLING PLAN.	08/02/2021
Environmental	COGCC approves Operator's Additional Investigative Actions plan.	08/02/2021

Total: 2 comment(s)