

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402937243

Receive Date:

01/27/2022

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>	Phone Numbers Phone: <u>(970) 6290308</u> Mobile: <u>(970) 6290308</u>
Address: <u>760 HORIZON DRIVE STE 400</u>		
City: <u>GRAND JUNCTION</u>	State: <u>CO</u> Zip: <u>81506</u>	
Contact Person: <u>Dana Pollack</u>	Email: <u>dpollack@utahgascorp.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21924 Initial Form 27 Document #: 402937243

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>LOCATION</u>	Facility ID: <u>314813</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>GETTY-PAN AM-61N102W 3NWSW</u>		Latitude: <u>40.083270</u>	Longitude: <u>-108.837365</u>
		** correct Lat/Long if needed: Latitude: <u>40.083453</u>	Longitude: <u>-108.837145</u>
QtrQtr: <u>NWSW</u>	Sec: <u>3</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>481420</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>Getty Pan Am 19A Release</u>		Latitude: <u>40.083432</u>	Longitude: <u>-108.837192</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWSW</u>	Sec: <u>3</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications GC

Most Sensitive Adjacent Land Use Non-Crop Land

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? Yes

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
- ☒ 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	GROUNDWATER	TBD	Auger Rig
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.

During normal operations, a froze line to tanks caused a rupture in the flowline. Free fluid was identified on working surface and pad was shut in. During excavation repairs, impacted soil was identified by staining and odor (it is assumed that subsurface findings were historic along with the recent release). After attempt to remove impacted soils on, the excavation the next morning had groundwater seep (~10 gallons) within bottom of excavation on. Along with the release, UGC is removing the Tank and flowline/dumpline at the site to remove equipment for the environmental assessment. Per 913. with the tank and flowline being removed and installed elsewhere on the site, this form 27 will parallel the release and the decommission/removal of the tank and flowline.

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):

See attached diagram for initial sampling efforts and for proposed monitoring wells. During monitoring well install, soil will be sampled for 915 along with field screening.

Proposed Groundwater Sampling

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

Groundwater sample collected from within excavation, during monitoring well install, wells will be sampled after purge/completion for 915.

Proposed Surface Water Sampling

- ☒ Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

NA - the river (0.16 miles west) is being monitored visually with no seen impacts to date. If visual detections are noted, surface water samples will be collected upgradient (background) and downgradient x2 for a approximate length of 0.5 miles away from site.

Additional Investigative Actions

- ☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Additional excavation to remove source area is scheduled and impacted material removed will be transported to disposal facility. Tracking and disposal manifests will be supplied for reporting. Approximately 20 yards has been removed and disposed of currently.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 7

-- Highest concentration of TPH (mg/kg) 9728

Number of soil samples exceeding 915-1 6

-- Highest concentration of SAR 26.8

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

BTEX > 915-1 Yes

Approximate areal extent (square feet) 800

Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 1

-- Highest concentration of Benzene (µg/l) 149

Was extent of groundwater contaminated delineated? No

-- Highest concentration of Toluene (µg/l) 29.8

Depth to groundwater (below ground surface, in feet) 6'

-- Highest concentration of Ethylbenzene (µg/l) 54.8

Number of groundwater monitoring wells installed 0

-- Highest concentration of Xylene (µg/l) 112

Number of groundwater samples exceeding 915-1 1

NA 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?

Background soil was collected at the site and a background monitoring well is proposed.

☒ 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?

Excavation of source needed after tank is removed.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Source material will be removed by heavy equipment. After initial phase of well install and data will determine steps for groundwater remediation.

REMEDIAL 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.

Due to groundwater being identified at site, site will not be closed within a calendar year. Once initial phase of delineation is completed, a better projected timeline will be available and proposed remediation strategy.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 200

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID #

Natural Attenuation

Excavate and onsite remediation

Other

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.

Currently 4 monitoring wells are proposed with and option to have a another well near point of release if impacts are discovered. Once installed the wells will be sampled for 915 quarterly. see attached diagram for proposed sites

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 Remediation Progress _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards _____ 200

E&P waste (solid) description _____ soil with hydrocarbon impacts

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____ Wonsit

Volume of E&P Waste (liquid) in barrels _____ 0

E&P waste (liquid) description _____ na

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____ na

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 is estimated to not be part of this project due to being within working surface of pad. If reclamation is needed, 1000 series rules will be followed.

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). 01/31/2022

Proposed site investigation commencement. 01/31/2022

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

Due to release, flowline/Tank removal/replacement will be delineated by soil sampling clearance also. Field screening will occur but impacts are known to be present and not relied on for clearance. Pending schedule for drill rig delineation. Excavation of source material to begin when load out trucks available. Documentation not provided in initial form 27 and/or pending results will be supplied when available in supplemental form 27(s). Spill ID 481420 will be requested closure once REM is assigned.

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

Signed: Matt Kasten

Title: Project Manager

Submit Date: 01/27/2022

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: 02/09/2022

Remediation Project Number: 21924

Condition of Approval**COA Type****Description**

	The operator shall ensure that any Flowlines are abandoned per rule 1105.
	Operator shall document any hydrocarbon sheen(s) present on groundwater during the monitoring wells installation and subsequent sampling events.
	Operator shall comply with Rule 913.b.(2) and conduct sampling and analysis of soil and Groundwater 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.
3 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**

402937243	FORM 27-INITIAL-SUBMITTED
402937317	SITE MAP
402937319	ANALYTICAL RESULTS
402937320	ANALYTICAL RESULTS
402937322	CORRESPONDENCE
402937323	ANALYTICAL RESULTS
402937324	ANALYTICAL RESULTS
402937331	CORRESPONDENCE
402937627	SOIL SAMPLE LOCATION MAP
402937632	SOIL SAMPLE LOCATION MAP

Total Attach: 10 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)