

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

02/17/2021

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>		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 #: 9849 Initial Form 27 Document #: 2526961

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 checked="" type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input checked="" 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 checked="" 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>100622</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>CARL ALLEN 4</u>		Latitude: <u>40.968358</u>	Longitude: <u>-108.305181</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWSW</u>	Sec: <u>28</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

653' FROM NATURAL DRAINAGE, 3543' FROM NEAREST WATER WELL

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
No	SOILS	Minimal	SOIL ANALYSIS
No	SURFACE WATER	None	Visual inspection
No	VEGETATION	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.

A visual inspection was performed looking for signs of leeching pit components that may have affected groundwater, surface water and vegetation. None were found. This pit was previously backfilled, not closed within the COGCC system, and when an auger sample was obtained, it did not meet Table 910-1 requirements.

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):

After approval to dig and haul the contaminated pit contents to a disposal facility, pit contents were excavated and hauled to R360 (see attachments for disposal tickets), approximately 180 yards were hauled, and analysis of the pit floor and walls were obtained (see attachments for GPS and soil observations during sampling). The initial samples after excavation didn't meet requirements for EC, SAR, Arsenic and TPH (pit floor). Further excavation (approximately 54 yards) was conducted on the pit floor to remove contamination and the floor was resampled (see attachments). The pit floor was resampled only after the second excavation, as the EC and SAR samples were below 3 feet and would not affect revegetation. Arsenic samples were taken, but the area has a naturally occurring high level of arsenic. The second sample (pit floor) met Table 910-1 requirements, with the exception of SAR and Arsenic. Again, the SAR is below 3 feet and the Arsenic is naturally high in the Powder Wash area.

Proposed Groundwater Sampling

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

No groundwater was encountered during excavation.

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 4

Number of soil samples exceeding 910-1 4

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 225

NA / ND

-- Highest concentration of TPH (mg/kg) 2750

-- Highest concentration of SAR 24.3

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 15

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) 234

Volume of liquid waste (barrels) 0

☐ Is further site investigation required?

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.

Pit contaminants were excavated with a trackhoe and hauled to R360 in LaBarge, WY. Please see the attached disposal tickets.

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.

Wexpro Company has removed the contaminants from the pit area, fenced off the pit area to avoid intrusion by livestock. The pit area will be backfilled to grade upon approval.

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) _____ 234

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 was not encountered during sampling or excavation.

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? Yes _____

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

N/A

Volume of E&P Waste (solid) in cubic yards 234

E&P waste (solid) description E&P contaminated waste, pit contents, produced water in soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: R360, Calpet, LaBarge, WY

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

E&P waste (liquid) description N/A

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? Yes _____

Do all soils meet Table 910-1 standards? No _____

Does the previous reply indicate consideration of background concentrations? Yes _____

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? _____

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.

Final reclamation of this P&A'd well pad will commence after closure of both CA 4 pits (100622 & 100621).

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. 07/01/2017 _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____

Date of completion of Remediation. 01/11/2021 _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Wexpro Company requests approval to backfill the excavated pit area, as soil analysis now demonstrates compliance with COGCC Table 910-1 requirements (variance request previously submitted to not use Table 915). Wexpro Company requests closure and NFA of Facility 100622 and REM #9849 based on the attached site investigations and analytical results.

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: 02/17/2021

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: 05/16/2022

Remediation Project Number: 9849

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

	Pit Id 100622 was updated to Closed as a result of information presented here.
	The surface of this location is Federal, the operator shall comply with BLM Reclamation Rules.
	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required at the site.
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**

402601710	FORM 27-SUPPLEMENTAL-SUBMITTED
402601800	DISPOSAL MANIFESTS
402601803	ANALYTICAL RESULTS
402601804	SITE INVESTIGATION REPORT
402601817	ANALYTICAL RESULTS
402601820	SITE INVESTIGATION REPORT

Total Attach: 6 Files

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

Environmental	This report provides the information required in doc 402911532 (confirmation samples from excavation.).	05/16/2022
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Total: 1 comment(s)