

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

403164798

Receive Date:

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.

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

Report taken by:

OPERATOR INFORMATION

Name of Operator: UTAH GAS OP LTD DBA UTAH GAS CORP	Operator No: 10539	Phone Numbers Phone: (970) 629-0308 Mobile: ()
Address: 760 HORIZON DRIVE STE 400		
City: GRAND JUNCTION	State: CO Zip: 81506	
Contact Person: Dana Pollack	Email: dpollack@utahgascorp.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 23228 Initial Form 27 Document #: 403054188

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: PIT Facility ID: 107496 API #: _____ County Name: RIO BLANCO

Facility Name: PARK MOUNTAIN 31-7 Latitude: 39.805809 Longitude: -108.995298

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: NWNE Sec: 7 Twp: 3S Range: 103W Meridian: 6 Sensitive Area? No

Facility Type: WELL Facility ID: _____ API #: 103-09756 County Name: RIO BLANCO

Facility Name: PARK MOUNTAIN 31-7 Latitude: 39.806050 Longitude: -108.995480

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: NWNE Sec: 7 Twp: 3S Range: 103W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION Facility ID: 316089 API #: _____ County Name: RIO BLANCO
Facility Name: PARK MOUNTAIN-63S103W 7NWNE Latitude: 39.805949 Longitude: -108.995436
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NWNE Sec: 7 Twp: 3S Range: 103W Meridian: 6 Sensitive Area? Yes

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? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input 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
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.

Per rule 911, facility decommissioning, site will have surface soil samples collected to ensure compliance for 915. Pit 107496 is related to site and will be assessed if located. (aerial imagery displays pit to east side of tanks). A historic pit sample was collected on 4/19/2022 at a depth of 6ft at the coordinates provided by the COGCC website for the historic pit. The historic pit sample result was found to have exceedances in total TPH.

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):

Soil samples will be collected where equipment was removed from most likely impacted areas. Pit will be investigated via heavy equipment and sampled accordingly if impacts discovered. All initial samples will be analyzed for 915. Sampling for pit remediation will begin with opening up the historic pit until clean walls are exposed. Samples will be taken from each wall and the bottom of the pit to ensure the extent of the impacts have been delineated. Samples from the historic pit excavation will be grab samples analyzed for 915.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>6</u>	<u> </u> Highest concentration of TPH (mg/kg) <u>8220</u>
Number of soil samples exceeding 915-1 <u>2</u>	<u> </u> Highest concentration of SAR <u>12.4</u>

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

BTEX > 915-1 No

Approximate areal extent (square feet) 0

Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected

 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 additional background samples were submitted during initial sampling. Total samples collected is 9 (including backgrounds).

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?

UGC plans to open up the historic pit until clean walls are obtained. Additional grab soil samples will be taken at each wall and bottom of excavated pit. Collected samples will be analyzed under table 915.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The historic pit will be excavated by using a backhoe/trackhoe. The pit will be dug until there are clean walls and bottom. Contaminated material will be stockpiled on the eastern side of the pad, away from natural drainages.

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.

Hauling the material to disposal offsite is highly improbable due to the remote nature of the well pad. UGC is planning to excavate the historic pit pending the approval of landfarm remediation by various agencies. Estimated start date would be October 3rd 2022. UGC anticipates the TPH to be cleared from the soil by October 2023, allowing reclamation to commence in the fall of 2023.

Remediation will begin once all four walls and bottom of the excavation are cleared via soil sampling under table 915. The excavated material will be stockpiled on the eastern side of the pad away from natural drainages. The excavation hole will be fenced with wildlife safe fencing to prevent injury or impact to native wildlife species. There will be a clean earthen berm placed around the perimeter of the landfarm area and then encircled with straw wattles to ensure there is no movement of contaminated material. Landfarmed material will spread at a depth of no more than 18 inches and will be turned every 6 weeks, weather permitting, to exposure of air and moisture events. When the material is turned, a 5-point composite sample will be taken from 6-12 inches below the average surface of landfarmed material. After turning the soil, the earthen berms will be reinstated. When conducting final landfarm samples, there will be a sample taken on the underlying floor of the sample to ensure no contaminants have leached though.

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

If Yes: Estimated Volume (Cubic Yards) _____
Name of Licensed Disposal Facility or COGCC Facility ID # _____
Yes _____ Excavate and onsite remediation
Yes _____ Land Treatment
No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ 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.

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 _____

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Operator anticipates the remaining cost for this project to be: \$ _____

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 _____

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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.

Please view attached reclamation plan.

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 provide the seed mix? No

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

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/02/2023

Proposed date of completion of Reclamation. 10/16/2023

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. 09/13/2022

Actual Spill or Release date, or date of discovery. 04/19/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/23/2022

Proposed site investigation commencement. 05/23/2022

Proposed completion of site investigation. 11/14/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/14/2022

Proposed date of completion of Remediation. 09/25/2023

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

UGC is proposing the reclamation plans and landfarm remediation of the Park Mountain 31-7 location. Landowner approval has been achieved and attached in this document.

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

Signed: Dana Pollack

Title: Environmental Specialist

Submit Date: _____

Email: dpollack@utahgascorp.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: _____

Date: _____

Remediation Project Number: 23228

COA Type**Description**

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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**

403165121	OTHER
403165122	RECLAMATION PLAN

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)