

State of Colorado Oil and Gas Conservation Commission

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403164798

Receive Date:

09/14/2022

Report taken by:

John Heil

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.

OPERATOR INFORMATION

Name of Operator: <u>UTAH GAS OP LTD DBA UTAH GAS CORP</u>	Operator No: <u>10539</u>	Phone Numbers
Address: <u>760 HORIZON DRIVE STE 400</u>		Phone: <u>(970) 629-0308</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>	Mobile: <u>()</u>

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: <u>PIT</u>	Facility ID: <u>107496</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PARK MOUNTAIN 31-7</u>		Latitude: <u>39.805809</u>	Longitude: <u>-108.995298</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNE</u>	Sec: <u>7</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>103-09756</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PARK MOUNTAIN 31-7</u>		Latitude: <u>39.806050</u>	Longitude: <u>-108.995480</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNE</u>	Sec: <u>7</u>	Twp: <u>3S</u>	Range: <u>103W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

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:

- ☐ 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	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

Number of soil samples collected 6

Number of soil samples exceeding 915-1 2

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

NA / ND

_____ Highest concentration of TPH (mg/kg) _____

_____ Highest concentration of SAR _____

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.

REMEDIAL ACTION 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 through.

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

_____ Natural Attenuation

_____ Other _____

_____ 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: 09/14/2022

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: John Heil

Date: 11/03/2022

Remediation Project Number: 23228

COA Type**Description**

	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.
	Operator shall comply with Rule 911.c.(2) and collect a sufficient number of representative samples from locations beneath a Pit to demonstrate that no leakage of managed fluids has occurred. Operators will ensure that any soil left in place meets the cleanup concentrations listed in Table 915-1.
2 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**

403164798	FORM 27-SUPPLEMENTAL-SUBMITTED
403165121	OTHER
403165122	RECLAMATION PLAN

Total Attach: 3 Files

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

Environmental	Based on the elevated values of Diesel Range Organics (DRO 4630 mg/kg) and Oil Range Organics (ORO 1990 mg/kg) in the historical pit sample, COGCC denies the operator's request to utilize a "landfarm" for remediation activities on the location.	11/03/2022
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Total: 1 comment(s)