

State of Colorado  
Oil and Gas Conservation Commission

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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>	<b>Phone Numbers</b>
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>	
		Phone: <u>(970) 6290308</u>
		Mobile: <u>(970) 6290308</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
No	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 15  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 0

**NA / ND**

-- Highest concentration of TPH (mg/kg) 10.29  
-- Highest concentration of SAR 48.2  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 6

**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**

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

\_\_\_\_\_ 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.

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 \_\_\_\_\_

## 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.

Remediation cost for project will be \$0. Reclamation cost for project have been bid out and will be \$9,660 for earthwork services and \$6,000 for seeding.

Operator anticipates the remaining cost for this project to be: \$ 15660

## 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? Yes \_\_\_\_\_

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? Yes \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? Yes \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? Yes \_\_\_\_\_

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.

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). Seed mix provided by BLM, approved reclamation plan attached.

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? Yes

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

Did the local soil conservation district provide the seed mix? Yes

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 08/15/2022

Proposed date of completion of Reclamation. 09/01/2022

## 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

PM 9010 P&A Facility Closure: Note, all equipment and well was plugged prior to new rules but was sampled accordingly where equipment sat prior to removal.

UGC is requesting:

1. Project to remain under RSL, groundwater not encountered and estimated at greater than 100' bgs.
2. Consideration of footnotes 1 and 11, arsenic identified in background samples above source areas.
3. Backgrounds for SAR and pH concentrations identified above source areas.
4. Consideration of 913.e.2.c; produced water sampled collected for operator knowledge, report attached.
5. PIT 107495; due diligence report attached, closure of pit.
6. Closure of REM 19388 and all corresponding locations/facilities associated with project.

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: 07/13/2022

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: 11/03/2022

Remediation Project Number: 19388

## COA Type

## Description

<u>COA Type</u>	<u>Description</u>
1 COA	Based on a review of the information provided, it appears that no further action is necessary at this time and COGCC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.

## 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

<u>Att Doc Num</u>	<u>Name</u>
403104301	FORM 27-SUPPLEMENTAL-SUBMITTED
403104332	ANALYTICAL RESULTS
403104334	RECLAMATION PLAN
403104335	OTHER
403104336	OTHER
403104337	SOIL SAMPLE LOCATION MAP
403104338	SOIL SAMPLE LOCATION MAP
403104339	ANALYTICAL RESULTS
403104340	ANALYTICAL RESULTS
403104342	ANALYTICAL RESULTS
403104344	ANALYTICAL RESULTS
403104346	ANALYTICAL RESULTS
403104349	PHOTO DOCUMENTATION
403104356	ANALYTICAL RESULTS

Total Attach: 14 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)