

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403107153
Receive Date:
11/21/2022

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: 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@gmail.com | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 26329 Initial Form 27 Document #: 403107153

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: 117372 | API #: _____ | County Name: RIO BLANCO |
| Facility Name: GOVERNMENT 2 | | Latitude: 40.079496 | Longitude: -108.798593 |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: SWSW | Sec: 1 | Twp: 1N | Range: 102W Meridian: 6 Sensitive Area? Yes |

| | | | |
|-----------------------------|--------------------|--|---|
| Facility Type: WELL | Facility ID: _____ | API #: 103-07901 | County Name: RIO BLANCO |
| Facility Name: GOVERNMENT 2 | | Latitude: 40.079601 | Longitude: -108.798648 |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: SWSW | Sec: 1 | Twp: 1N | Range: 102W Meridian: 6 Sensitive Area? Yes |

Facility Type: LOCATION Facility ID: 315092 API #: _____ County Name: RIO BLANCO
Facility Name: GOVERNMENT-61N102W 1SWSW Latitude: 40.079601 Longitude: -108.798648
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: SWSW Sec: 1 Twp: 1N Range: 102W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GM 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

Dry ephemeral streambed running from northwest to south east approximately 210 feet west of well head.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|---|
| <input type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | Historic findings included in Form 27. _____ |
| <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 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 | 500sq ft | 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 results in soil investigation of site after equipment is removed.

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):

The wellhead, separator, tanks, and historic pit will be sampled. Each will be grab samples analyzed for components pursuant to 915 rules. PIT 117372, is unknown within database and will be investigated according to 900 series rules for closure. There will also be three background samples to be tested for pH, arsenic, electrical conductivity and sodium adsorption ratio.

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):

Source removal/delineation will need to occur when weather is cooperative. Timeline will be communicated to COGCC when project will commence.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 10

Number of soil samples exceeding 915-1 10

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

Approximate areal extent (square feet) 500

NA / ND

-- Highest concentration of TPH (mg/kg) 13533.7

-- Highest concentration of SAR 23.1

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 13

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 background samples were collected from adjacent land.

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 is still waiting on the removal of a tank, samples will be collected from under the tank at the time of removal.
 UGC will excavate and sample around the well head further to delineate the extent of TPH impacts.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Source impacts will be removed by heavy machinery.

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.

Impacts discovered will need remediation and will delay closure until weather allows access. Likely closure of project will be spring 23'. If access is better and source/delineation is secured prior to then, a supplemental form 27 will be submitted with documentation.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)
 _____ Chemical oxidation
 _____ Air sparge / Soil vapor extraction
 _____ Natural Attenuation
 _____ Other _____

Yes Excavate and offsite disposal
 _____ If Yes: Estimated Volume (Cubic Yards) 250
 Name of Licensed Disposal Facility or COGCC Facility ID # _____
 _____ Excavate and onsite remediation
 _____ Land Treatment
 _____ Bioremediation (or enhanced bioremediation)
 _____ Chemical oxidation
 _____ Other _____

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.

A reclamation plan is being drafted for the landowner and will be presented when onsite and plan is completed.

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. _____

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). 07/22/2022

Proposed site investigation commencement. 07/22/2022

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

Initial form 27 for Gov 2 resubmittal, data attached and errors corrected from COGCC correspondence. A form 19 has been on impacts discovered.

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: 11/21/2022

Email: dpollack@gmail.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: 12/12/2022

Remediation Project Number: 26329

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 for the closure of Pit Facility ID 117372. |
| | Operator shall comply with Rule 911.b and report on a Form 19 Spill/Release Report all spills or release discovered during closure operations pursuant to Rule 912. |
| | Operator is not in compliance with Rule 911.a.(1) as they did not obtain the directors approval prior to this site investigation. Operator shall comply with Rule 911.a.(1) and obtain the Director's approval of the Form 27 prior to conducting any investigation or closure operations. |
| | For the closure of Pit Facility ID 117372, Operator shall comply with Rule 911.j.(3) and submit water quality analysis data using a Form 43, Analytical Sample Submittal. This shall include suitable electronic data deliverable generated by the laboratory and PDF of lab reports within 3 months of sample collection. |
| 5 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 |
|--------------------|---------------------------|
| 403107153 | FORM 27-INITIAL-SUBMITTED |
| 403107187 | MAP |
| 403234024 | SITE INVESTIGATION PLAN |
| 403234027 | ANALYTICAL RESULTS |
| 403234028 | SOIL SAMPLE LOCATION MAP |
| 403234029 | ANALYTICAL RESULTS |
| 403234030 | ANALYTICAL RESULTS |

Total Attach: 7 Files

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|-------------------|--|---------------------|
| Environmental | Based on the exceedances of TPH Diesel Range Organics [C10-C28], TPH Oil Range Organics [C28-C36], SAR and Arsenic in the GOV 1035-2 Nwall, GOV 1035-2 WH Center and GOV 1035-2 WH Center Bottom soil samples, COGCC does not approve the use of land treatment for remediation of impacted material associated with the discovered spill/release. | 12/12/2022 |

Total: 1 comment(s)