

# 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: <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>		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@gmail.com</u>	Mobile: <u>( )</u>

### 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: <u>PIT</u>	Facility ID: <u>117372</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>GOVERNMENT 2</u>		Latitude: <u>40.079496</u>	Longitude: <u>-108.798593</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>1</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>103-07901</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>GOVERNMENT 2</u>		Latitude: <u>40.079601</u>	Longitude: <u>-108.798648</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>1</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

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:

☐ E&P Waste
 ☐ Other E&P Waste
 ☒ Non-E&P Waste

☐ Produced Water

☐ Workover Fluids

Historic findings included in Form 27.

☐ 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	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 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.

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 )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 250

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

## 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.

Based on the current COI provided, UGC has a total of \$6MM of sudden & accidental pollution. Estimation of project will be disposal, lab, and 3rd party contractor fees, estimation is \$30,000 for project.

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

### 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:

NA

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:

## 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)