

State of Colorado  
Energy & Carbon Management Commission

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403508489  
Receive Date:  
08/28/2023

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@utahgascorp.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33123 Initial Form 27 Document #: 403508489

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: WELL	Facility ID: _____	API #: 103-08022	County Name: RIO BLANCO
Facility Name: HILL 10-31	Latitude: 40.097698	Longitude: -108.772747	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSE	Sec: 31	Twp: 2N	Range: 101W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 315168	API #: _____	County Name: RIO BLANCO
Facility Name: HILL-62N101W 31NWSE	Latitude: 40.097698	Longitude: -108.772747	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSE	Sec: 31	Twp: 2N	Range: 101W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SC \_\_\_\_\_

Most Sensitive Adjacent Land Use Farmland and private property. High priority habitats in the area. \_\_\_\_\_

Is domestic water well within 1/4 mile? Yes \_\_\_\_\_

Is surface water within 1/4 mile? Yes \_\_\_\_\_

Is groundwater less than 20 feet below ground surface? Yes \_\_\_\_\_

### **Other Potential Receptors within 1/4 mile**

There are three water wells within a 0.25 mile radius. These water wells appear to have domestic use. Surface water is also within 0.25 miles of the well pad. The surface water is identified as White River. Due to the proximity of the White River, groundwater is anticipated to be within 20 of the ground surface. Nearby water wells have a water level at 19ft. This location is located within 15 miles of the Rangely city water intake, therefore falling under the 411 rules. This well pad is also within 0.25 miles of an "aquatic native species conversation waters" zone.

# 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 type="checkbox"/> Pit Bottoms  |  |
|  | <input checked="" type="checkbox"/> Other (as described by EPA) _____ Unknown at this time. |  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Unknown	Sampling under Table 915

## INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

UGC has plugged the Hill 10-31 well. UGC environmental team will take grab samples from the well head, and where the flowlines are cut/capped on and off location. Initial sampling will consist of samples collected at the well head, where the on location flowline is cut, and where the off location flowline is cut. Three additional background samples will be collected as apart of initial site investigation. All soil samples collected with be tested for constituents under Table 915. Groundwater may be present at this location. If groundwater is encountered, a water sample will be collected and tested under the protection of groundwater in Table 915.

## 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 ):

"Grab" soil samples will be collected during initial site investigation. Samples will be collected from the following locations: well head, on location flowline (cut and capped), and off location flowline (cut and capped). All samples will be tested under Table 915. Attached in this form is a diagram that depicts these locations.

### Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

If groundwater is encountered at this location, samples will be collected and tested under the protection of groundwater outlined in Table 915.

### 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 \_\_\_\_\_ 0

\_\_\_\_\_ Highest concentration of TPH (mg/kg) \_\_\_\_\_

Number of soil samples exceeding 915-1 \_\_\_\_\_ 0

\_\_\_\_\_ Highest concentration of SAR \_\_\_\_\_

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

BTEX > 915-1 \_\_\_\_\_

Approximate areal extent (square feet) 0

Vertical Extent > 915-1 (in feet) 0

**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?

\_\_\_\_\_

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**

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

TBD - no source removal is anticipated at this time.

**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.

TBD

**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

\_\_\_\_\_ 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.

If groundwater is impacted, a remediation monitoring plan will be created and communicated to the COGCC in a timely manner.

# 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 current COI provided by Acord, Utah Gas Corp has a total of \$6MM of sudden and accidental pollution. The primary layer in the General Liability Policy is \$1MM per occurrence and a \$5MM umbrella totaling \$6MM. Remediation of site will occur with no further costs. Remaining costs for project will be for reclamation. Contractor reclamation bidding will not take place until soil sampling is complete; although based on recent reclamations, UGC anticipates the reclamation of this well pad to be \$50,000.

Operator anticipates the remaining cost for this project to be: \$ 50000 \_\_\_\_\_

## 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: \_\_\_\_\_

# 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.

Utah Gas Corp is the owner of the land associated with the well pad. Utah Gas Corp will reclaim the well pad in accordance with COGCC rules and regulations.

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. 11/01/2024

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). 10/16/2023

Proposed site investigation commencement. 10/16/2023

Proposed completion of site investigation. 09/30/2024

### 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**

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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: 08/28/2023

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: 12/11/2023

Remediation Project Number: 33123

**COA Type****Description**

0 COA	

**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**

403508489	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403508611	SOIL SAMPLE LOCATION MAP
403508612	MAP
403620657	FORM 27-INITIAL-SUBMITTED

Total Attach: 4 Files

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

Environmental	See Form 42 Doc #403508639 for more information.	12/11/2023
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Total: 1 comment(s)