

State of Colorado Energy & Carbon Management Commission

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Document Number:

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: <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 #: 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: <u>WELL</u> | Facility ID: _____ | API #: <u>103-08022</u> | County Name: <u>RIO BLANCO</u> |
| Facility Name: <u>HILL 10-31</u> | | Latitude: <u>40.097698</u> | Longitude: <u>-108.772747</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>NWSE</u> | Sec: <u>31</u> | Twp: <u>2N</u> | Range: <u>101W</u> |
| | | Meridian: <u>6</u> | Sensitive Area? <u>Yes</u> |
| Facility Type: <u>LOCATION</u> | Facility ID: <u>315168</u> | API #: _____ | County Name: <u>RIO BLANCO</u> |
| Facility Name: <u>HILL-62N101W 31NWSE</u> | | Latitude: <u>40.097698</u> | Longitude: <u>-108.772747</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>NWSE</u> | Sec: <u>31</u> | Twp: <u>2N</u> | Range: <u>101W</u> |
| | | Meridian: <u>6</u> | Sensitive Area? <u>Yes</u> |

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:

- ☐ 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) _____ 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

Number of soil samples collected _____ 0

Number of soil samples exceeeding 915-1 _____ 0

NA / ND

_____ Highest concentration of TPH (mg/kg) _____

_____ 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

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 |
|---------------|--------------------------------------------------|------------|

Total: 1 comment(s)