

State of Colorado Energy & Carbon Management 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>	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 1/4 mile of the Hill 10-31 well head. The closest water well is 0.06 miles (295ft) southwest of the well head. Review the DWR water well documents shows that water depth in this well is at 20ft. The second closest water well is 0.14 miles (719ft) southwest of the well head and groundwater is found between 10-15ft depth. The furthest water well sits 0.18miles (941ft) in the northeast direction from the well head and has water at a depth of 19ft. The water wells sit at an average elevation of 5,238ft and the well pad is at an elevation of 5,235ft, UGC believes there to be groundwater within 10ft of the surface.

Surface water is also within 1/4 miles of the well head. The surface water is identified as the White River.

The Hill 10-31 well pad 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 conservation waters" zone.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

☐ Produced Water

☐ Workover Fluids

No impacts found during soil sampling.

☐ 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	NA	Soil 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 pad. UGC environmental team has taken samples from the well head, and where flowlines were cut and capped. All soil samples collected have been tested for constituents under Table 915. Groundwater was not encountered during the initial investigation and is not expected to be within 10ft of the surface.

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):

A total of 5 soil samples were collected as apart of this investigation. 2 background samples were collected and 3 samples were collected from the well pad (well head, and where flowlines were cut and capped).

Proposed Groundwater Sampling

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

Groundwater will be sampled if encountered.

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 5

Number of soil samples exceeeding 915-1 3

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet)

NA / ND

-- Highest concentration of TPH (mg/kg) 13.5

-- Highest concentration of SAR 15.1

BTEX > 915-1 No

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? Yes _____

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

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?

Two background samples were collected as site investigation for the Hill 10-31 site decommissioning. Included in the soil lab summary table are two additional background samples collected at the Ski 31-1, which is a separate investigation project within 0.50miles from the Hill 10-31 well pad. UGC is requesting consideration of these additional background samples for the closure of this remediation. UGC believes that the Ski 31-1 background results are indicative of background levels in the Hill 10-31 investigation area.

☐ 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.

No source is to be removed at this site.

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.

UGC believes that there are no impacts to soil or groundwater at the Hill 10-31 and the SAR, EC, and pH overages are indicative of background levels in this area.

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

 No Bioremediation (or enhanced bioremediation)

 No Chemical oxidation

 No Air sparge / Soil vapor extraction

 No Natural Attenuation

 No 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.

No groundwater was intercepted during the site investigation of the Hill 10-31 well pad.

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.

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

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.

UGC is the owner of the land associated with the Hill 10-31 well pad. Utah Gas Corp will reclaim the well pad in accordance with the ECMC 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. 06/03/2024

Proposed date of completion of Reclamation. 06/18/2024

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. 11/30/2023

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

UGC is requesting closure of REM# 33123 for the Hill 10-31. UGC believes that overages in SAR, EC, and pH are indicative of background levels commonly found in the area. UGC has included background sample results from a nearby investigation project (Ski 31-1) in the soil lab summary.

SAR, EC and pH at the site are above Table 915 standards, but are within local background concentrations. Consideration of Table 915-1 footnotes 1 and 3 is requested for the SAR, EC and pH sample results. UGC collected a produced water sample and tested for hexavalent chromium, pH and metals. Attached to this form is an operator knowledge statement which describes that UGC does not believe the overages on the pad were caused by product lost from the well.

Naphthalene sample results were below the laboratory practical quantitation limit (PQL) of 0.00408 mg/kg in all samples. Consideration of Table 915-1 footnote 9 is requested for all Naphthalene sample results.

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: 12/22/2023

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: 12/26/2023

Remediation Project Number: 33123

COA Type**Description**

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

403599933	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403599969	ANALYTICAL RESULTS
403599971	ANALYTICAL RESULTS
403599972	SOIL SAMPLE LOCATION MAP
403611904	ANALYTICAL RESULTS
403622139	OTHER
403635863	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)