

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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403592184

Receive Date:

11/10/2023

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: UTAH GAS OP LTD DBA UTAH GAS CORP | Operator No: 10539              | Phone Numbers         |
| Address: 760 HORIZON DRIVE STE 400                  |                                 | Phone: (970) 629-0308 |
| City: GRAND JUNCTION                                | State: CO                       | Zip: 81506            |
| Contact Person: Dana Pollack                        | Email: dpollack@utahgascorp.com | Mobile: ( )           |

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 25976 Initial Form 27 Document #: 403121586

## 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 #: 103-09960       | County Name: RIO BLANCO                     |
| Facility Name: LOWER HORSE DRAW 2238           | Latitude: 39.869247 | Longitude: -108.962459 |   |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |   |
| QtrQtr: SESW                                   | Sec: 16             | Twp: 2S                | Range: 103W Meridian: 6 Sensitive Area? Yes |

  

|  |                     |                        |   |
|--|---------------------|------------------------|---|
| Facility Type: LOCATION                        | Facility ID: 316183 | API #: _____           | County Name: RIO BLANCO                     |
| Facility Name: LOWER HORSE DRAW-62S103W 16SESW | Latitude: 39.869208 | Longitude: -108.962536 |   |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |   |
| QtrQtr: SESW                                   | Sec: 16             | Twp: 2S                | Range: 103W Meridian: 6 Sensitive Area? Yes |

|  |                     |                     |                         |
|--|---------------------|---------------------|-------------------------|
| Facility Type: SPILL OR RELEASE          | Facility ID: 483320 | API #:              | County Name: RIO BLANCO |
| Facility Name: Under Surface Equipment   |                     | Latitude: 39.869057 | Longitude: -108.962643  |
| ** correct Lat/Long if needed: Latitude: |                     | Longitude:          |                         |
| QtrQtr: SESW                             | Sec: 16             | Twp: 2S             | Range: 103W             |
| Meridian: 6                              |                     | Sensitive Area? Yes |                         |

## **SITE CONDITIONS**

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Non-cropland

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

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

Nearest surface water is a retention pond that sits 0.19 miles (996 feet) northeast of the wellhead. The nearest water well is 0.31 miles northeast of the wellhead. No other receptors are near the site.

## 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)

### DESCRIPTION OF IMPACT

| Impacted? | Impacted Media | Extent of Impact | How Determined           |
|-----------|----------------|------------------|--------------------------|
| Yes       | SOILS          | <5 cubic yard    | 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.

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, tank, dry stack and meter will be sampled. Each will be grab samples analyzed for components pursuant to 915 rules. 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 ):

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

#### Soil

Number of soil samples collected 22

Number of soil samples exceeding 915-1 11

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

Approximate areal extent (square feet) 25

#### NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

## Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

Highest concentration of Benzene (µg/l)

Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

Highest concentration of Xylene (µg/l)

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?

Yes, background samples were collected. Out of the 22 total soil samples collected, 8 of them were background samples.

☐ 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 believes that no further site investigation is required and all samples fall within the Table 915 standard and/or are cleared via background sample results.

## 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.

The source was removed by excavation and material will be hauled to disposal once dirt work reclamation begins.

## REMEDIATION 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.

Remediation of existing impacts is accomplished by excavating the area and removing impacted soil. Additional samples were collected to delineate the extent of impact. Impacted material will be hauled away the next time equipment is on location-dirt work reclamation.

## Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 5

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID #

Natural Attenuation

No Excavate and onsite remediation

Other

Land Treatment

Bioremediation (or enhanced bioremediation)

Chemical oxidation

|    |   |
|----|---|
| No | Bioremediation ( or enhanced bioremediation ) |
| No | Chemical oxidation                            |
| No | Air sparge / Soil vapor extraction            |
| No | Natural Attenuation                           |
| No | Other   |

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.

Groundwater was not encountered at this location during site investigation. The nearest water well is 0.29 miles upstream of the well pad. The well pad sits at an elevation of 6494ft and the water well is located at an elevation of 6554ft. Upon investigation into Colorado Division of Water Resources, the mentioned water well is 900ft deep and is in water bearing sand from 200ft to 400ft. With this information, UGC believes that groundwater is not within 100ft of the surface at the LHDU 2238 well pad.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☒ Other

TBD

#### ☐ 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. UGC at this time is only estimating only lab fees for environmental and reclamation for this project. ~\$35,000 for total.

Operator anticipates the remaining cost for this project to be: \$ 35000

### 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.

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

Is the described reclamation complete? \_\_\_\_\_

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? \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

### 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). 08/22/2022

Proposed site investigation commencement. 08/22/2022

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**

UGC understands that there is still a slight overage in pH on the well pad compared to background results (BG~8.81, WHW~8.86), but believes that this reading is indicative of background concentrations, and requests relief from the pH total on the LH DU 2238 WHW sample. These overages were found during initial site decommissioning samples. A analytical package is included with the submittal of this document, which includes: all analytical data, sampling diagram, and data summary table.

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: 11/10/2023

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: 02/27/2024

Remediation Project Number: 25976

**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**

|           |                                |
|-----------|--------------------------------|
| 403592184 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403592202 | SOIL SAMPLE LOCATION MAP       |
| 403592203 | PHOTO DOCUMENTATION            |
| 403592208 | ANALYTICAL RESULTS             |
| 403592210 | ANALYTICAL RESULTS             |
| 403592211 | ANALYTICAL RESULTS             |
| 403592212 | ANALYTICAL RESULTS             |
| 403592213 | ANALYTICAL RESULTS             |
| 403592214 | ANALYTICAL RESULTS             |

Total Attach: 9 Files

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

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)