

State of Colorado  
Energy & Carbon Management Commission

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Report taken by:

KRIS NEIDEL

## 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 ECMC 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>WEXPRO COMPANY</u>	Operator No: <u>95960</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 45003</u>		Phone: <u>(307) 352-7561</u>
City: <u>SALT LAKE CITY</u>	State: <u>UT</u>	Zip: <u>84145-0601</u>
Contact Person: <u>April Stegal</u>	Email: <u>april.stegall@dominionenergy.com</u>	Mobile: <u>(307) 371-3610</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 10075 Initial Form 27 Document #: 401224019

#### 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: 2024 Q2 update and 2024 delineation plan submittal

#### SITE INFORMATION

No Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>100690</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>CARL ALLEN 11</u>	Latitude: <u>40.954789</u>	Longitude: <u>-108.298997</u>	
	** correct Lat/Long if needed: Latitude: <u>40.953444</u>	Longitude: <u>-108.298669</u>	
QtrQtr: <u>NESW</u>	Sec: <u>33</u>	Twp: <u>12N</u>	Range: <u>97W</u>
	Meridian: <u>6</u>	Sensitive Area? <u>No</u>	

#### SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Rangeland, Non-cropland, Oil and Gas

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

192' from natural drainage, 3256' from nearest water well.

## 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
No	GROUNDWATER	None	Visual inspection
Yes	SOILS	See analysis	Soil analysis
No	SURFACE WATER	None	Visual inspection

### INITIAL ACTION SUMMARY

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

Pit was previously backfilled. Historic Google Earth imagery indicates that the pit was closed some time between 2006 and 2014.

### 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 ):

Please see the attachment for proposed soil sampling.

#### Proposed Groundwater Sampling

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

A visual inspection was performed looking for signs of stained soil and potential leeching of pit components that may have impacted surface or ground water, none were found. No groundwater was encountered during previous sampling. If groundwater is encountered during delineation or remediation, COGCC will be notified immediately.

#### Proposed Surface Water Sampling

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

A visual inspection was performed looking for signs of stained soil and potential leeching of pit components that may have impacted surface or ground water, none were found.

### Additional Investigative Actions

☐ Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

N/A

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 5

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 2473

### NA / ND

-- Highest concentration of TPH (mg/kg) 4892

-- Highest concentration of SAR 51.8

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 30

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

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

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?

Based on analytical and field screening results, horizontal impacted soil delineation is considered incomplete. Vertical impacted soil delineation is considered complete because soil impacts were observed to extend to the bedrock surface, and bedrock was recovered at 26 ft bgs in the center borehole. Investigation of bedrock impacts was conducted within the abilities of the drilling equipment. However, the horizontal and vertical extent of bedrock impacts remains unsolved. Please see the attachment for plan to complete delineation.

## 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.

Please see the attached remedial action plan for remedial options. It has been recommended that delineation be completed before choosing a remediation practice to better understand the full content of contamination.

## 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.

The top two remedial option candidates include in situ soil vapor extraction (SVE) and SVE with in situ soil heating. It has been recommended that additional soil data be gathered prior to final selection of remedial technology to be implemented. Please see the attached remedial action plan and plan to complete delineation for more information.

## Soil Remediation Summary

☒ In Situ

☐ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
Yes \_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
Yes Other \_\_\_\_\_ SVE with in situ soil heating

\_\_\_\_\_ Excavate and offsite disposal  
\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_  
\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_  
\_\_\_\_\_ Excavate and onsite remediation  
\_\_\_\_\_ 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.

N/A, there is no indication that groundwater was impacted. If groundwater is encountered during remediation, COGCC will be notified immediately.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☒ Other

Wexpro will follow COGCC recommendations for reporting frequency.

#### ☒ Request Alternative Reporting Schedule:

☒ Semi-Annually☐ Annually☐ Other

Wexpro requests semi-annual reporting due to the large amount of remediation projects. Wexpro Company requests that this remediation project be scheduled for Q2 and Q4 reporting until it is closed.

#### 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 SVE system

### 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.

Federal wells are currently covered by National Oil & Gas Lease Bond 106735945. State Land wells are currently covered under Bond 106963552 with the Colorado State Land Board. Gathering lines & facilities are covered by a Blanket Bond with COGCC, #107286675.

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 \_\_\_\_\_

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_

E&P waste (liquid) description \_\_\_\_\_

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No \_\_\_\_\_

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? No \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? Yes \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

Operator shall comply with the ECMC 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.

To be determined after delineation and remediation are complete.  
Reclamation will follow COGCC and BLM guidelines.

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? \_\_\_\_\_

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). 05/01/2017

Proposed site investigation commencement. 08/31/2017

Proposed completion of site investigation. 12/31/2025

### 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**

Please see the attached 2024 delineation plan. Delineation, per plan, will be completed upon ECMC and BLM (surface owner) approval.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: April Stegal

Title: Permit Agent

Submit Date: 06/27/2024

Email: april.stegall@dominionenergy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: KRIS NEIDEL

Date: 07/23/2024

Remediation Project Number: 10075

**COA Type****Description**

	This Site Investigation and Remediation Workplan (Form 27) is conditionally; however, additional information or activities may be required during the course of remediation.
	ECMC has not received the referenced previous delineation. Submittal of the results of delineation described here should include previous sample results.
2 COAs	

**ATTACHMENT 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**

403838027	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403838028	SITE INVESTIGATION PLAN
403862956	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	Start date of delineation is not stated, from communication with the operator, it is expected to take place in summer 2024.	07/23/2024
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Total: 1 comment(s)