

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403872000
Receive Date:
07/31/2024

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 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>UTAH GAS OP LTD DBA UTAH GAS CORP</u> | Operator No: <u>10539</u> | Phone Numbers Phone: <u>(970) 629-0308</u> Mobile: <u>()</u> |
| Address: <u>760 HORIZON DRIVE STE 400</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> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37227 Initial Form 27 Document #: 403872000

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>PIT</u> | Facility ID: <u>109473</u> | API #: _____ | County Name: <u>RIO BLANCO</u> |
| Facility Name: <u>FOUNDATION CREEK 7403</u> | Latitude: <u>39.655612</u> | Longitude: <u>-108.818810</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>NWSW</u> | Sec: <u>35</u> | Twp: <u>4S</u> | Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |
| Facility Type: <u>WELL</u> | Facility ID: _____ | API #: <u>103-07986</u> | County Name: <u>RIO BLANCO</u> |
| Facility Name: <u>FOUNDATION CREEK B 7403</u> | Latitude: <u>39.660658</u> | Longitude: <u>-108.825514</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>SENE</u> | Sec: <u>34</u> | Twp: <u>4S</u> | Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

| | | | |
|-----------------------------------------------------|---------------------|------------------------|--------------------------------------------|
| Facility Type: LOCATION | Facility ID: 315144 | API #: | County Name: RIO BLANCO |
| Facility Name: FOUNDATION CREEK B-64S102W 34SENE | Latitude: 39.660626 | Longitude: -108.825783 | |
| ** correct Lat/Long if needed: Latitude: | | Longitude: | |
| QtrQtr: SENE | Sec: 34 | Twp: 4S | Range: 102W Meridian: 6 Sensitive Area? No |

SITE CONDITIONS

| | | | |
|--------------------------------------------------------|----|-----------------------------------|---------------------------|
| General soil type - USCS Classifications | SC | Most Sensitive Adjacent Land Use | Private surface rangeland |
| Is domestic water well within 1/4 mile? | No | Is surface water within 1/4 mile? | No |
| Is groundwater less than 20 feet below ground surface? | No | | |

Other Potential Receptors within 1/4 mile

The are no water wells within 1 mile of the well pad. Water well data was found for a well 1.83miles in the northwest direction from the well pad. This water well sits an elevation of 7,006ft, and has perforated casing from 80-125ft below the surface. The Foundation Creek 7403 well pad is at an elevation of 7700ft. Utah Gas Corp does not anticipate groundwater within 20ft of the surface. If groundwater is intercepted during site investigation, a groundwater sample will be collected and sampled under Table 915.

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 until soil sampling _____ |

DESCRIPTION OF IMPACT

| Impacted? | Impacted Media | Extent of Impact | How Determined |
|--------------|----------------|------------------|-------------------------------|
| UNDETERMINED | SOILS | Unknown | 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 is plugging the Foundation Creek 7403. UGC environmentalist will take samples from the surface under all equipment and when disconnecting associated pipelines. Surface equipment includes: well head (sampled at 4ft depth), meter (1ft depth), tanks (1ft depth), and separator (1ft depth). Samples will be collected at all location where the flowline and gathering lines are cut and capped. Samples from under surface equipment and pipeline disconnections will be analyzed for constituents in Table 915. Three background samples will also be collected as apart of the initial investigation at the Foundation Creek 7403 well pad. Background samples will be used for reference to the samples collected on the well pad. Any surface equipment samples in exceedance with Table 915 will be reported to the ECMC via Form 19/Form27, and will be excavated further to delineate the vertical and horizontal extent of impact.

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):

Samples will be collected from under all surface equipment, and locations where the associated pipelines are disconnected. These samples include: well head, meter, separator, and tanks. Three background samples will also be collected as apart of initial site investigation. There is a historic pit related to this well pad. UGC will make every attempt to locate the historic pit during initial site investigation.

Proposed Groundwater Sampling

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

Groundwater is not expected to be encountered at this location. In the event groundwater is intercepted, a sample will be collected and analyzed under Table 915 for impacts.

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 _____

Highest concentration of SAR _____

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

BTEX > 915-1 _____

Approximate areal extent (square feet) _____

Vertical Extent > 915-1 (in feet) _____

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.

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.

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 ECMC 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.

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.

Operator anticipates the remaining cost for this project to be: \$ 115000 _____

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: _____

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.

Reclamation plan is being drafted and will be presented to the landowner (BLM) for approval prior to dirt work reclamation.

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. _____

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). 08/05/2024

Proposed site investigation commencement. 08/05/2024

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

The Foundation Creek 7403 has three associated pits. Their Pit ID#'s are 109469 (closed), 109468 (duplicate), and 109473. Utah Gas Corp will make every effort to locate the historic pit 109473.

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: 07/31/2024

Email: dpollack@utahgascorp.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: John Heil

Date: 10/08/2024

Remediation Project Number: 37227

COA Type**Description**

| | |
|-------|--|
| 0 COA | |
|-------|--|

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**

| | |
|-----------|---------------------------------------------|
| 403872000 | INVESTIGATION/REMEDATION WORKPLAN (INITIAL) |
| 403872070 | SOIL SAMPLE LOCATION MAP |
| 403872071 | SITE MAP |
| 403949264 | FORM 27-INITIAL-SUBMITTED |

Total Attach: 4 Files

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

| | | |
|---------------|------------------------------------------------------|------------|
| Environmental | ECMC approves the workplan outlined on this Form 27. | 10/08/2024 |
|---------------|------------------------------------------------------|------------|

Total: 1 comment(s)