

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 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>	<b>Phone Numbers</b>
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>	Phone: <u>(970) 629-0308</u>
		Mobile: <u>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37687 Initial Form 27 Document #: 403897771

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>103-10204</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>SOUTHEAST DOUGLAS CREEK CBM 805</u>	Latitude: <u>39.777522</u>	Longitude: <u>-108.636185</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>20</u>	Twp: <u>3S</u>	Range: <u>100W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>314837</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>S E DOUGLAS CREEK-63S100W 20NENE</u>	Latitude: <u>39.777522</u>	Longitude: <u>-108.636185</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>20</u>	Twp: <u>3S</u>	Range: <u>100W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

## SITE CONDITIONS

General soil type - USCS Classifications SC \_\_\_\_\_

Most Sensitive Adjacent Land Use 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 SE Douglas 805 location is within high priority habitat. There are no other potential receptors within 1/4 mile. There are three water wells within a 1 mile radius of the well pad. Water well data shows perforated casing between 70 and 100ft below the surface. Groundwater at the SE Douglas Creek 805 well pad is not anticipated to be within 20ft of the surface.

## 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	None	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.

Initial action: site decommissioning for final reclamation. Samples were collected and show no sign of impacts under Table 915 with consideration of footnotes 1 and 11.

### 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 ):

Eight soil samples were collected as apart of the initial site investigation. Three background samples were collected, and five were collected from the well pad. The well pad samples are as follows: well head, meter, separator, tank, and flowline. All samples collected from this project were grab samples, and analyzed for constituents under Table 915. Attached is a sample diagram illustrating where the samples were collected.

#### 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 ):

UGC is proposing to close the investigation of this site based on the recent soil sample results.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 8  
Number of soil samples exceeding 915-1 8  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 0

### NA / ND

Highest concentration of TPH (mg/kg) \_\_\_\_\_  
Highest concentration of SAR \_\_\_\_\_  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 0

### 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 \_\_\_\_\_  
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  
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?

Background samples were collected as apart of this site investigation, and UGC requests consideration of footnote 1 to reference these 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?

Utah Gas Corp is requesting the closure of this remediation based off the soil sample results with consideration of footnote 1 and 11.

## 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 oil and gas well facility is being decommissioned after plugging the well. All production equipment and flowlines have been removed from the location. No source impact was found on initial soil samples for site decommissioning.

### 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.

After initial site investigation soil sampling, no impacts were found to soils. Groundwater was not encountered during this project.

### Soil Remediation Summary

In Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

Ex Situ

- \_\_\_\_\_ 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**

- 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.

Groundwater was not encountered during initial site investigation.

# 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 \_\_\_\_\_

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: \_\_\_\_\_

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

Is additional groundwater monitoring to be conducted? No

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.

A reclamation plan is being drafted and will be presented to the landowner (BLM) prior to beginning work.

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. 04/30/2025

Proposed date of completion of Reclamation. 05/15/2025

## 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). 08/22/2024

Proposed site investigation commencement. 08/22/2024

Proposed completion of site investigation. 10/09/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

Proposed date of completion of Remediation. 10/09/2024

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 initial Form 27 (DOC# 403897771) for the SE Douglas Creek 805 well has not yet been approved. UGC is requesting the closure of this site investigation and plans to move forward with site reclamation once these documents have been approved.

UGC is requesting the consideration of ECMC 900 Series rule footnote 1 and 11, to consider background levels of arsenic and pH.

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: 10/09/2024

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: 11/25/2024

Remediation Project Number: 37687

**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 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**

403950872	FORM 27-SUPPLEMENTAL-SUBMITTED
403950959	SOIL SAMPLE LOCATION MAP
403950960	ANALYTICAL RESULTS
403950961	ANALYTICAL RESULTS

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)