

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 ECOM 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 Phone: (970) 629-0308 Mobile: ()
Address: 760 HORIZON DRIVE STE 400		
City: GRAND JUNCTION	State: CO	Zip: 81506
Contact Person: Dana Pollack	Email: dpollack@utahgascorp.com	

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

Facility Type: LOCATION Facility ID: 315144 API #: County Name: RIO BLANCO
Facility Name: FOUNDATION CREEK B-64S102W Latitude: 39.660626 Longitude: -108.825783
34SENE
** 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:

- 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) Unknown until soil sampling

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	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):

As of 10/11/2024, additional investigation is required to delineate the extent of impact at the well head. Initial analytical data shows overages in TPH at the well head. Utah Gas Corp is planning to excavate a 10x10x5ft hole around the well head and will sample the north, south, east, west and bottom of the excavation and have them analyzed for TPH.

Initial sample results also indicate overages in arsenic at various places on the well pad. Utah Gas Corp sampled the produced fluids from the Foundation Creek 7403 on 6/15/2023. The produced fluid was tested for hex chromium, pH, and metals. The produced fluid sample shows that arsenic was undetectable. Please see operator knowledge statement and analytical results for further explanation.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 8
Number of soil samples exceeding 915-1 7
Was the areal and vertical extent of soil contamination delineated? No
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? 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?

Three background samples were collected as apart of this site investigation. Utah Gas Corp request consideration of 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?

Further site investigation is required for the TPH found at the well head sample. Utah Gas Corp plans to excavate the affected area to a 10x10x5ft hole with a backhoe. All excavated material will be hauled to offsite disposal. Samples will be collected from the excavation north, south, east, west and bottom walls and tested for TPH.

There are also overages in arsenic at several positions on the well pad. Prior to plugging the Foundation Creek 7403 well pad, Utah Gas Corp environmentalist collected a produced water sample. The analytical results from the produced water sample indicates that arsenic was below the detection limit. Please see the operator knowledge statement for further details.

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 will be removed by physical excavation with a backhoe. All excavated material will be hauled to offsite disposal using dump trucks. The disposal facility is not determined 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.

Remediation of the site will occur through site excavation, and delineation of the historical spill/release through soil sampling. Utah Gas Corp will continue to excavate the site until clean margins have been achieved. Analytical findings will be communicated to the ECOM via Form 27.

Soil Remediation Summary

In Situ Ex Situ

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

Yes Excavate and offsite disposal
 If Yes: Estimated Volume (Cubic Yards) _____ 18
 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.

Groundwater is not anticipated at this location. Should groundwater be encountered, UGC will collect a sample and report its findings to the ECMC.

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.

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

Utah Gas Corp is requesting a reduced analyte list at the well head to sample only for TPH overages.

Utah Gas Corp has attached an operator knowledge statement depicting the produced water sample collected from the Foundation Creek 7403 well on 6/15/2023. The analytical data from this sample shows that arsenic was undetectable in the produced water. Therefore, UGC is requesting relief from the arsenic overages found on the well pad.

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: 10/11/2024 _____

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: 37227 _____

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**

403954905	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403954923	SOIL SAMPLE LOCATION MAP
403954925	ANALYTICAL RESULTS
403954926	ANALYTICAL RESULTS
403954931	ANALYTICAL RESULTS
403954932	ANALYTICAL RESULTS
403954933	ANALYTICAL RESULTS
403954934	OTHER
404007017	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)