

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403973668

Receive Date:

10/29/2024

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: 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 & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 37625 Initial Form 27 Document #: 403894953

#### 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 #: 077-09755	County Name: MESA
Facility Name: OPAL 8102-18I	Latitude: 39.359940	Longitude: -108.811190	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: Lot 24	Sec: 18	Twp: 8S	Range: 102W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION	Facility ID: 312746	API #: _____	County Name: MESA
Facility Name: OPAL-68S102W 18LOT 24	Latitude: 39.359940	Longitude: -108.811900	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: Lot 24	Sec: 18	Twp: 8S	Range: 102W Meridian: 6 Sensitive Area? No

## 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**

There is a dry range pond 400ft in the northeast direction from the well head. It has been observed that this pond is typically devoid of water. There is a dry ephemeral streambed running parallel to the southern edge of the well pad, approximately 290ft south of the well head. There is a large berm along the southern edge of the well pad preventing pollutants from entering the stream.

There are two water wells approximately 1.5 miles from the well pad. Nearby water well data shows a depth to water at 70ft below the surface, therefore groundwater is not anticipated within 20ft of the surface at this location. If groundwater is encountered during site investigation and delineation, UGC will collect a water sample and analyze it for constituents 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)

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Undetermined	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.

Utah Gas Corp has plugged the Opal 8102 well and has removed associated production equipment. UGC environmentalist has collected soil samples from underneath all surface equipment and from where the flowlines have been removed. Background samples have also been collected as apart of this investigation.

### 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 ):

Soil samples have been collected as apart of this investigation. Utah Gas Corp has collected the following samples from the well pad: well head (4ft depth), meter (1ft depth), tank (1ft depth), separator (1ft depth), and flowline (4ft depth). Initial analytical data shows overages in SAR and EC at the well head and flowline locations. Additional site investigation required.

#### Proposed Groundwater Sampling

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

Utah Gas Corp does not anticipate groundwater at this location. If groundwater is encountered, UGC will collect a sample and analyze it for constituents under Table 915. Analytical results for potential groundwater samples will be communicated to the ECMC via Form 27.

#### 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 ):

Utah Gas Corp is planning a site excavation at the location of the well head sample and the flowline sample. Excavated soils will be hauled to an offsite disposal facility. UGC is requesting to analyze samples from this excavation for SAR and EC only.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

#### Soil

Number of soil samples collected 10

Number of soil samples exceeeding 915-1 2

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

#### NA / ND

-- Highest concentration of TPH (mg/kg) 25.7

-- Highest concentration of SAR 74.3

BTEX > 915-1 No

Approximate areal extent (square feet) 100

Vertical Extent > 915-1 (in feet) 6

#### Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? Yes

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

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?

A total of five background samples were collected as apart of this project. Four of the background samples were collected at a depth of 1' below the surface. One sample was collected from a depth of 4' to provide insight to samples collected at depth on the well pad.

☐ 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 and Utah Gas Corp is currently scheduling site excavation at the well head and flowline locations. Excavated material will be hauled to an offsite disposal facility. UGC is requesting the samples from the excavation to be analyzed for SAR and EC only.

### 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 hauling to an offsite disposal facility. Utah Gas Corp is currently scheduling the site excavation with local contract companies.

#### 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.

Utah Gas Corp will be removing all impacted soils from the well head and flowline locations. New samples will be collected along the excavation walls and sampled for EC and SAR if approved.

#### Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 20

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

Natural Attenuation

No Excavate and onsite remediation

Other

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 has not been encountered at this location.

## 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? 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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

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.

A reclamation plan is being drafted and will be presented to the landowner (BLM) prior to final 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). 08/20/2024

Proposed site investigation commencement. 08/20/2024

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 scheduling the excavation of impacted material at the well head and flowline sample locations. All impacted material will be hauled to an offsite disposal facility. Utah Gas Corp plans to collect samples from the excavation walls (north, south, east, west, and bottom), and is requesting a reduced analyte list to sample only for SAR and EC within the excavation zone.

Utah Gas Corp has also submitted an initial Form 19 for the overages found at this location. The document number is 403966307. Utah Gas Corp will submit an additional Form 19 for closure once the remediation project number has been assigned for this project.

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: 10/29/2024

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: 12/04/2024

Remediation Project Number: 37625

**COA Type****Description**

	If potential hydrocarbon related impacts are observed during additional delineation activities, operator shall collect sample(s) for full Table 915-1.
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**

403973668	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403973719	SOIL SAMPLE LOCATION MAP
403973722	ANALYTICAL RESULTS
403973723	ANALYTICAL RESULTS
403973724	ANALYTICAL RESULTS
403973726	ANALYTICAL RESULTS
404015982	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

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

Environmental	ECMC approves the reduced analyte suite of EC and SAR.	12/04/2024
---------------	--	------------

Total: 1 comment(s)