

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>	Phone Numbers Phone: <u>(970) 629-0308</u> Mobile: <u>()</u>
Address: <u>734 MAIN STREET 3RD FLOOR</u>		
City: <u>GRAND JUNCTION</u>	State: <u>CO</u>	Zip: <u>81501</u>
Contact Person: <u>Dana Pollack</u>	Email: <u>dpollack@utahgascorp.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37685 Initial Form 27 Document #: 403897962

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>103-07832</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>FEDERAL 31-1</u>	Latitude: <u>39.834675</u>	Longitude: <u>-108.656970</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>31</u>	Twp: <u>2S</u>	Range: <u>100W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>315052</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>FEDERAL-62S100W 31SWNE</u>	Latitude: <u>39.834630</u>	Longitude: <u>-108.656946</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>31</u>	Twp: <u>2S</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

Approximately 0.60miles to the south of this well pad is NSO Habitat for Aquatic Sportfish Management Waters. This well pad is also located within mule deer density habitats. There is one water well located 1.40 miles southwest of the well pad. The water well shows perforated casing from 106-130ft below the surface. Groundwater is not anticipated at the Cath Fed 33-1 well pad.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" 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 type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	18.5 cubic yards	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.

Utah Gas Corp is plugging the Cathedral Federal 31-1 well. As apart of decommissioning of oil and gas facilities, soil samples will be collected from underneath all surface equipment, and at the point where the associated flowlines are cut and capped.

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):

Utah Gas Corp will collect "grab" samples from the following locations: well head (4ft depth), meter (1ft depth), separator (1ft depth), and tank (1ft depth). A sample will also be collected from where the associated flowlines are disconnected. Samples collected from the well pad will be analyzed under Table 915. Three background samples will also be collected as apart of initial site investigation to be used for comparison to the samples collected from the well pad. If groundwater is encountered during site investigation, a water sample will be collected and also analyzed for constituents outlined in Table 915.

Proposed Groundwater Sampling

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

Groundwater is not anticipated at this site. If groundwater is encountered, a sample will be collected.

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):

Additional investigative actions are needed. The initial well head sample at the Cath Fed 31-1 well had a reading of 567.181 mg/kg for Total TPH. The well head area was excavated to a 10ft x 10ft x 5ft hole. Samples were collected from the excavation walls and bottom on 12/11/2024. Analytical data from the excavation on 12/11/2024 shows that the walls of the excavation have readings within the Table 915-1 guidelines except the well head bottom sample which reads 1,990.165 mg/kg.

Additional excavation is required for this project to further delineate the extent of impact at the well head.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 12

-- Highest concentration of TPH (mg/kg) 1990.165

Number of soil samples exceeding 915-1 3 -- Highest concentration of SAR 9.77

Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No

Approximate areal extent (square feet) 100 Vertical Extent > 915-1 (in feet) 5

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

 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?

Two background samples were taken during initial soil sampling on 10/29/2024. Addiotnal background samples will be collected for background comparison of SAR and EC levels found on the well pad.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 18 Volume of liquid waste (barrels) 0

Is further site investigation required?

Yes, further site investigation is required to fully delineate the extent of TPH impacts to the well head.
Additional background samples will be collected to compare levels of EC and SAR to the levels found on the well pad.

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 material at the well head will be removed via backhoe and dump truck to an offsite disposal facility.

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.

All excavated impacted material is being hauled to an offsite disposal facility via dump truck. Utah Gas Corp plans to continue site investigation and excavation until the impacts are fully delineated. All excavated material will be removed from the location and sent to an offsite disposal facility.

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 ECOM 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 impacted during site investigation. If groundwater is encountered, UGC will collect samples and communicate its findings to the ECMC via Form 27.

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 Remediation Progress Update

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 this site will occur with no further costs. Remaining costs for this project will be for site reclamation. Contractor bidding will not take place until soil sampling is completed; although based on recent reclamations, UGC anticipates the reclamation of this well pad to be \$68,000.

Operator anticipates the remaining cost for this project to be: \$ 68000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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) before reclamation activities commence.

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. 08/01/2025

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). 08/22/2024

Proposed site investigation commencement. 08/22/2024

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 to sample for TPH, SAR and EC.

Utah Gas Corp plans to excavate deeper at the well head excavation to delineate the extent of impact to TPH. Additional background samples will be collected at depth to be used for comparison to SAR and EC readings 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: 01/14/2025

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: 03/20/2025

Remediation Project Number: 37685

COA Type**Description**

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**

404056715	FORM 27-SUPPLEMENTAL-SUBMITTED
404056764	ANALYTICAL RESULTS
404056766	ANALYTICAL RESULTS
404056767	ANALYTICAL RESULTS
404056768	SOIL SAMPLE LOCATION MAP
404056769	DISPOSAL MANIFESTS

Total Attach: 6 Files

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

Environmental	ECMC approves the reduced analyte suite of TPH, SAR and EC.	03/20/2025
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Total: 1 comment(s)