

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37859 Initial Form 27 Document #: 403947981

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>103-08252</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>GETTY-AMOCO 29 29</u>	Latitude: <u>40.076815</u>	Longitude: <u>-108.845587</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>9</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>315299</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>GETTY-AMOCO 29-61N102W 9NWNW</u>	Latitude: <u>40.077466</u>	Longitude: <u>-108.857285</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>9</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: LOCATION	Facility ID: 397207	API #:	County Name: RIO BLANCO
Facility Name: PAN AM-TIDEWATER (RECTOR)- 61N102W 9NWNE	Latitude: 40.076816	Longitude: -108.845825	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNE	Sec: 9	Twps: 1N	Range: 102W Meridian: 6 Sensitive Area? Yes

### **SITE CONDITIONS**

General soil type - USCS Classifications SM	Most Sensitive Adjacent Land Use Rangeland/Private Property
Is domestic water well within 1/4 mile? Yes	Is surface water within 1/4 mile? Yes
Is groundwater less than 20 feet below ground surface? Yes	

### **Other Potential Receptors within 1/4 mile**

The Getty Amoco 29 well head is located within 70ft of the White River. The well pad boundary is within 30ft of the White River. There is a water well located on the north side of the White River approximately 0.28 miles northwest of the Getty Amoco 29 well pad. The data from this water well shows the well reaches a depth of 50ft, but does not supply data on the perforated casing depth.

This well pad location is within CDPHE Reg 42 - Limited Use and Quality.  
 This well pad location is within CPW Rule 1202.c NSO Habitat for aquatic native species conservation waters and bald eagle active nest site qtr mile.  
 This well pad location is within CPW Rule 1202.d Density Habitat for mule deer sever winter range and pronghorn winter concentration.  
 This well pad is in close proximity to USFWS national wetlands inventory - riverine.

Groundwater is expected within 10ft of the surface at the Getty Amoco 29 well pad.

# 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 Getty Amoco 29. UGC environmentalist will collect samples from underneath all production equipment and where flowlines are disconnected. Surface equipment at the Getty Amoco 29 includes: well head (sampled at 4ft depth) and the tank (sampled at 1ft depth). Samples will be collected from where the flowlines are cut and capped or removed from location. Samples collected from the well pad will be analyzed for constituents under Table 915. Three background samples will also be collected as apart of initial site investigation. Background samples will be used for reference to samples collected on the well pad. Any samples in exceedance with Table 915 will be communicated to the ECMC via Form 19/Form 27, 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 ):

Soil samples will be collected as apart of initial site investigation. "Grab" samples will be collected from the well head, tank and flowlines. These samples will be analyzed for constituents under Table 915. Please see attached sampling diagram.

### Proposed Groundwater Sampling

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

Groundwater is anticipated at a depth of 10ft at this location. If groundwater is intercepted during site investigation, a sample will be collected and analyzed under Table 915.

### Proposed Surface Water Sampling

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

UGC is not anticipating the collection of a surface water sample at this time. The collection of a surface water sample will be communicated to the ECMC should this change.

## 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 _____ 6	-- Highest concentration of TPH (mg/kg) _____ 101.0 5
Number of soil samples exceeding 915-1 _____ 6	-- Highest concentration of SAR _____ 1.55

Was the areal and vertical extent of soil contamination delineated? Yes \_\_\_\_\_

BTEX > 915-1 No \_\_\_\_\_

Approximate areal extent (square feet) \_\_\_\_\_ 0

Vertical Extent > 915-1 (in feet) \_\_\_\_\_ 0

**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 \_\_\_\_\_ 0

Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 \_\_\_\_\_ 0

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 will be collected as part of this initial site investigation. Background samples collected had elevated levels of arsenic. The arsenic found on the well pad is indicative of background levels. UGC is requesting consideration of Table 915 footnote 1 for background samples containing arsenic.

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 believes there was no source material identified during site investigation, and requests to close the remediation number associated with this 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.

No source removal was identified during initial site investigation. Overages in arsenic on the well pad are indicative of nearby background concentrations.

**REMEDATION 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 believes there is no remediation necessary at this well pad, based on initial soil sample results.

**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**

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.

If groundwater is found during initial site investigation, a sample will be collected and analyzed for constituents under Table 915. If impacts to groundwater are found, Utah Gas Corp will communicate its findings with a Form 19/Form 27 and proceed with remediation measures (monitoring plan, sample schedule, etc.).

During initial site investigation on 11/7/2024, groundwater was not intercepted.



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 (private) for approval. UGC will receive ECMC approval of this reclamation plan via Form 4 prior to commencing reclamation activities at this well pad.

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. 11/01/2025

Proposed date of completion of Reclamation. 11/15/2025

## 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). 10/21/2024

Proposed site investigation commencement. 10/21/2024

Proposed completion of site investigation. 12/09/2024

### 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 requests the consideration of Table 915-1 Footnote 1 for the consideration of background samples in regards to arsenic found on the well pad. Utah Gas Corp also requests the consideration of Table 915-1 Footnote 11 for arsenic found on the well pad and in background levels.

Utah Gas Corp is requesting the close of this remediation project (REM# 37859).

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: 01/23/2025

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: 03/26/2025

Remediation Project Number: 37859

**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**

404019918	FORM 27-SUPPLEMENTAL-SUBMITTED
404019953	ANALYTICAL RESULTS
404019954	ANALYTICAL RESULTS
404067834	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)