

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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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: UTAH GAS OP LTD DBA UTAH GAS CORP	Operator No: 10539	Phone Numbers
Address: 734 MAIN STREET 3RD FLOOR		Phone: (970) 629-0308
City: GRAND JUNCTION	State: CO	Zip: 81501
Contact Person: Dana Pollack	Email: dpollack@utahgascorp.com	Mobile: ( )

## PROJECT, PURPOSE &amp; 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: WELL	Facility ID: _____	API #: 103-08252	County Name: RIO BLANCO
Facility Name: GETTY-AMOCO 29 29	Latitude: 40.076815	Longitude: -108.845587	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 9	Twp: 1N	Range: 102W Meridian: 6 Sensitive Area? Yes

  

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

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	Twp: 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:

☐ 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
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

Number of soil samples collected 6

Number of soil samples exceeding 915-1 6

#### NA / ND

-- Highest concentration of TPH (mg/kg) 101.05

-- 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 apart 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.

### 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 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.

## 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.

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 the site will occur with no further costs. Remaining costs for this project will be for reclamation.

Operator anticipates the remaining cost for this project to be: \$ 60000

### 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? Yes ☐

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)