

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 #: 7437 Initial Form 27 Document #: 2231297

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: CULVERT PIT CLOSURE

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>316064</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>LOWER HORSE DRAW UNIT-62S103W 15SESW</u>		Latitude: <u>39.877368</u>	Longitude: <u>-108.944176</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>15</u>	Twp: <u>2S</u>	Range: <u>103W</u> Meridian: <u>6</u> Sensitive Area? <input type="checkbox"/> Yes <input type="checkbox"/> No

SITE CONDITIONS

General soil type - USCS Classifications CL 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

NA, AN UNNAMED TRIBUTARY TO BIG HORSE DRAW 1452' W. NO WATER WELLS WITHIN 1/4 MILE OF THE 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	limited to pad surface	excavation and soil borings

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

This Form 27 is being submitted to initiate the document trail for closure of the historical culvert pit on Encanas Lower Horse Draw Unit 2166 well pad. ? Culvert pits? were installed historically as containment for well blow down liquids and consist of a 6 to 8 foot diameter steel ring (vertical corrugated culvert) approximately 4 to 8 feet deep placed in the ground with a cement bottom. The culvert pit will be replaced with an above ground storage tank set in a lined secondary containment. A topographic location map is included with this submittal. All activities conducted in support of this pit closure project will be carried out in accordance with COGCC Rules 905, 907, and 909 for conducting a site investigation in support of pit closures. The following discussion was prepared to present general procedures for Encana?s approach to pit closures and any associated remediation and documentation. This form is being submitted prior to the initiation of pit closure activities on this location. All subsequent data gathered in support of this project will be submitted to the COGCC with in a Form 4 (Sundry Notice), and will reference the COGCC assigned Remediation Project number. With approval of this Form 27, and in compliance with COGCC rules governing the closure of pits, Encana will initiate the pit closure project with the following activities: 905.b(2) & 905.b(4) ? All fluids and/or solids will be removed from the pit and will be reused or disposed of at a permitted disposal facility or Encana owned injection well. 905.b(4) ? Discrete representative samples will be collected from below the culvert pit following removal of the tank ring and cement, and will be analyzed for compliance with COGCC Table 910-1. One full suite (Table 910-1) discrete sample will be collected from the soil directly below the culvert pit. Additional discrete samples will be collected from the pit bottom, and if necessary pit walls, and analyzed for the organic constituents listed in Table 910-1. The number of additional samples collected will be adequate to represent the size and/or impacts present below the culvert pit. Sample results will be provided to the COGCC in supplementary submission(s) for this remediation project. 905.c ? A Form 4 (Sundry Notice) will be submitted to document the onsite disposal of material in excess of the allowable concentrations identified in Table 910-1 or remediationon location

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):

A total of two soil borings in the vicinity were advanced and soil samples were collected from the discreet impacted interval (depth). Based on the initial assessments, the Table 910-1 compounds of concern are BTEX and TPH.

Spring 2021 - limited excavation is proposed to address remaining impacted soil in the vicinity of PITSW01 soil boring location.

Proposed Groundwater Sampling

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

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 2
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 9550
NA Highest concentration of SAR
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 2

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? Yes
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
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?

For arsenic, SAR, specific conductivity, and pH quantifications only.

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?

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 initial source of impacted soil was removed and land treated back in 2012. Soil samples collected demonstrated land treatment was successful and soils were compliant with Table 910-1 standards.

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.

Initial excavation activities were limited to above and below ground equipment located on the well pad. August 2013, soil borings were advanced to delineate the vertical and lateral extent of the soil impacts. Where impacts were observed, biovent (passive) wells were installed to promote enhanced bio-attenuation of the remaining hydrocarbons.

In April 2018, two soil borings were advanced adjacent to the boreholes where soils impacts had historically been above Table 910-1 standards. The compounds of concern are BTEX and TPH. The Total BTEX was decreased from 147.8 ppm to 50.54 ppm; benzene decreased from 8.1 ppm to 0.814 ppm. BTEX in the other soil boring is compliant. TPH decreased from 8,600 ppm to 3,649 ppm in one borehole and decreased from 4,406 ppm to 2,404 ppm. A greater than (>) 50 % decrease in overall soil impacts.

Two soil borings were advanced in October 2020 to track remedial progress; one borehole showed compliance for Table 910-1 (PIT-W-01) Borehole PIT-SW-01 was still impacted.

Annual confirmation samples were collected from borehole PIT-SW-01 at depth of 12' and 15' bgs. Most recent sampling data indicates that soil is below Table 915.1.

Soil Remediation Summary

In Situ

Yes Bioremediation (or enhanced bioremediation)

No Chemical oxidation

No Air sparge / Soil vapor extraction

Yes Natural Attenuation

No Other _____

Ex Situ

No Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) _____

Name of Licensed Disposal Facility or ECMC Facility ID # _____

Yes Excavate and onsite remediation

Yes Land Treatment

No Bioremediation (or enhanced bioremediation)

No Chemical oxidation

No 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.

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? 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? 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? No

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.

The footprint for the backfilled culvert pit occurs within the pad boundary for this producing well pad. The backfilled pit will become part of the pad's working surface.

Is the described reclamation complete? Yes

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? Yes

If YES, does the seed mix comply with local soil conservation district recommendations? Yes

Did the local soil conservation district provide the seed mix? _____

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). _____

Proposed site investigation commencement. 08/23/2012

Proposed completion of site investigation. 08/26/2013

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/26/2013

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

This report is to ask for closure for Remediation Project #7437 (LHDU 2166). Document # 402525544 submitted in 2020 provided evidence that the remaining soil impacts were limited to the vicinity of borehole PITSW-01. Annual soil samples were collected from the impacted area in 2021, 2022, 2023, and 2024 at two at depths ranging from 12-15 ft bgs. The most recent sampling data at each depth is below the table 915.1 standards. Due to data being below table 915.1 standards closure is asked to be considered. See all supplemental information the the attachments.

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: 06/04/2025

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: 09/22/2025

Remediation Project Number: 7437

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**

404025749	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404026431	ANALYTICAL RESULTS
404026434	ANALYTICAL RESULTS
404026436	ANALYTICAL RESULTS
404026438	ANALYTICAL RESULTS
404026439	ANALYTICAL RESULTS
404026464	SOIL SAMPLE LOCATION MAP
404080364	ANALYTICAL RESULTS
404089767	SOIL SAMPLE LOCATION MAP
404363053	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 10 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)