

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404427237

Receive Date:

Report taken by:

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 | Mobile: () |
| Contact Person: Dana Pollack | Email: dpollack@utahgascorp.com | | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24242 Initial Form 27 Document #: 403066052

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: PIT Facility ID: 117390 API #: _____ County Name: RIO BLANCO

Facility Name: SKI 31-1 Latitude: 40.097766 Longitude: -108.765572

** correct Lat/Long if needed: Latitude: 40.098056 Longitude: -108.762853

QtrQtr: NESE Sec: 31 Twp: 2N Range: 101W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL Facility ID: _____ API #: 103-07976 County Name: RIO BLANCO

Facility Name: SKI 31-1 Latitude: 40.097959 Longitude: -108.763566

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: NESE Sec: 31 Twp: 2N Range: 101W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION Facility ID: 315136 API #: County Name: RIO BLANCO
Facility Name: SKI-62N101W 31NESE Latitude: 40.096276 Longitude: -108.763482
** correct Lat/Long if needed: Latitude: 40.098127 Longitude: -108.762616
QtrQtr: NESE Sec: 31 Twp: 2N Range: 101W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 484367 API #: County Name: RIO BLANCO
Facility Name: Historic Pit Latitude: 40.098067 Longitude: -108.762861
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESE Sec: 31 Twp: 2N Range: 101W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Cropland

Is domestic water well within 1/4 mile? No 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

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 checked="" 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 | To be determined | Soil sampling and laboratory analysis |

INITIAL ACTION SUMMARY

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

Per Rule 913.c.(1) and Rule 913.c.(9), soil samples were collected in support of facility decommissioning and pit closure. Initial investigation sampling was performed on June 27 and October 26, 2022. Organic and inorganic impacts were identified at the wellhead, beneath the above ground storage tanks (ASTs), and in the base and sidewalls of the pit. Excavation and subsequent sampling was performed from May 31 through October 20, 2023. See the attached Site Investigation Report for additional details.

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 were collected at the wellhead, separator, ASTs, and historic pit. Samples were analyzed for all Table 915-1 soil constituents. Based on results of site investigation efforts to date, UGC requests a reduced analyte list of sodium adsorption ratio (SAR), specific conductivity (EC), pH, and arsenic. Additional background samples may be collected to further characterize native levels of inorganic constituents. Please note PIT 117390 is unknown within the Colorado GIS database.

Proposed Groundwater Sampling

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

If groundwater is encountered during site investigation activities, a sample will be collected and analyzed for Table 915-1 groundwater constituents.

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 | NA / ND |
| Number of soil samples collected <u>42</u> | -- Highest concentration of TPH (mg/kg) <u>4240</u> |
| Number of soil samples exceeding 915-1 <u>21</u> | -- Highest concentration of SAR <u>155</u> |

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

BTEX > 915-1 No

Approximate areal extent (square feet) 5000

Vertical Extent > 915-1 (in feet) 13

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?

Eight background samples were collected from the Site in nearby, comparable, non-impacted soil to establish native levels of EC, SAR, pH, boron, and Table 915-1 metals. Results of background investigation are summarized in the attached Site Investigation Report.

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?

Additional background characterization is needed to determine whether elevated levels of EC, SAR, pH, and arsenic are attributed to oil and gas operations at the Site.

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.

Approximately 950 cubic yards of soil have been transported and disposed at Lapoint Recycling.

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.

The nearest constructed water well is located approximately 0.40 miles northwest of the Site sits approximately 11 feet lower in elevation than the Site. Division of Water Resources (DWR) records associated with well permit 66518 indicate a depth to water of 19 feet below ground surface (ft-bgs). Based on nearby water resources and elevation differences, depth to groundwater at the Site is estimated to measure approximately 30 feet below ground surface (ft-bgs). The information presented above combined with analytical results to date indicate that a pathway to groundwater is not expected at the Site and that ECOM Table 915-1 Residential Soil Screening Levels (RSSLs) are appropriate.

Initial investigation sampling was performed on June 27 and October 26, 2022. Organic and inorganic impacts were identified at the wellhead, beneath the above ground storage tanks (ASTs), and in the base and sidewalls of the pit. No soil impacts were identified at the separator. Excavation and subsequent sampling was performed from May 31 through October 20, 2023 to delineate the extent of identified impacts. Impacted soil was removed and transported to Lapoint Recycling for disposal.

As of October 20, 2024, all organic soil impacts have been delineated and removed by excavation in all remediation areas. Inorganic impacts associated with the wellhead, west AST, and pit have also been delineated and removed by excavation; however, inorganic impacts remain in the east AST investigation area. SAR, EC, and pH impacts remain undelineated vertically, arsenic and pH remain undelineated horizontally to the east, and EC remains undelineated horizontally to the west. Additional background characterization is recommended to determine whether remaining inorganic impacts are attributed to oil and gas operations at the Site.

Based on results of site investigation to date, UGC requests a reduced analyte list of EC, SAR, pH, and arsenic.

Soil Remediation Summary

In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

Ex Situ

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 950
Name of Licensed Disposal Facility or ECMC Facility ID # _____
No _____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ 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 encountered during site investigation efforts, a sample will be collected for characterization.

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 site will occur with no further costs.

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.

Reclamation will be completed in accordance with 1000 Series rules.

Is the described reclamation complete? _____

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? _____

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

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

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 11/06/2023

Proposed date of completion of Reclamation. 11/27/2026

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. 05/09/2022

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/13/2022

Proposed site investigation commencement. 06/13/2022

Proposed completion of site investigation. 03/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/13/2022

Proposed date of completion of Remediation. 10/20/2023

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:

The implementation schedule has been updated to reflect additional site investigation needs related to the east AST investigation and delineation.

OPERATOR COMMENT

This form has been submitted to provide results of site investigation efforts to date for Remediation Project 24242.

UGC requests alternative allowable limits for EC, SAR, and pH equal to native levels of each constituent in accordance with Table 915-1 Footnote 1 and alternative allowable limit for arsenic equal to 1.25x the native level. Proposed alternative allowable limits are as follows: EC of 5.430 mmhos/cm, SAR of 96.4, pH of 9.91, and arsenic of 5.59 mg/kg.

Assuming the alternative allowable limits are approved, organic soil impacts have been delineated vertically and horizontally and removed by excavation in all remediation areas. Inorganic impacts associated with the wellhead, west AST, and pit have also been delineated and removed by excavation; however, inorganic impacts remain in the east AST investigation area. SAR, EC, and pH impacts remain undelineated vertically, arsenic and pH remain undelineated horizontally to the east, and EC remains undelineated horizontally to the west. Additional background characterization is recommended to determine whether remaining inorganic impacts are attributed to oil and gas operations at the Site. Prior to additional investigation, UGC requests a reduced analyte list of SAR, EC, pH, and arsenic.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Dana Pollack

Title: Field Env. Specialist

Submit Date: _____

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: _____

Date: _____

Remediation Project Number: 24242

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**

| | |
|-----------|------------------------------|
| 404431053 | LABORATORY ANALYTICAL REPORT |
| 404431055 | LABORATORY ANALYTICAL REPORT |
| 404431057 | LABORATORY ANALYTICAL REPORT |
| 404431060 | LABORATORY ANALYTICAL REPORT |
| 404431063 | LABORATORY ANALYTICAL REPORT |
| 404431066 | LABORATORY ANALYTICAL REPORT |
| 404461287 | SITE INVESTIGATION REPORT |

Total Attach: 7 Files

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

| User Group | Comment | Comment Date |
|------------|---------|---------------------|
| | | Stamp Upon Approval |

Total: 0 comment(s)