

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404600158

Receive Date:

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34209 Initial Form 27 Document #: 403578664

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

No Multiple Facilities

Facility Type: GAS COMPRESSOR STATION	Facility ID: 432090	API #: _____	County Name: MESA
Facility Name: PREMIER BAR-X COMPRESSOR STATION	Latitude: 39.330191	Longitude: -109.023967	
** correct Lat/Long if needed: Latitude: 39.318447		Longitude: -108.979884	
QtrQtr: NENE	Sec: 31	Twp: 8S	Range: 104W Meridian: 6 Sensitive Area? Yes

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? Yes

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

Groundwater was found at 8ft depth on 10/19/2023. A sample was collected and sent to lab for sampling under the ECMC Table 915-1 concentration level standard.

**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)

**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	No exceedances remaining	Quarterly groundwater monitoring
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.

UGC hired third party LDAR company to fly a drone over sections of pipeline in the Grand Junction field. UGC was notified on 10/4/2023 of a suspected leak in a pipeline 20-30ft on the north side of West Salt Creek. The pipeline was immediately shut in on 10/5/2023. Initial site investigation and repairs were made to the line beginning 10/18/2023 and lasted until 10/20/2023. During initial site investigation, the pipeline was repaired, a protective coating was placed around the repair line to prevent corrosion from happening in the future, as well as having soil and water samples collected and sent to lab.

**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 ):

Additional soil samples will be collected to determine the horizontal and vertical extent of soil impacts. Samples will be submitted for all Table 915-1 soil constituents and results will be compared to Protection of Groundwater Screening Levels (PGWSLs). Additional background samples may be collected to further characterize native levels of inorganic constituents.

**Proposed Groundwater Sampling**

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

No additional groundwater sampling is proposed.

**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 17

Number of soil samples exceeding 915-1 17

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

Approximate areal extent (square feet) 3000

### NA / ND

-- Highest concentration of TPH (mg/kg) 27.1

-- Highest concentration of SAR 16.8

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

### Groundwater

Number of groundwater samples collected 29

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 8

Number of groundwater monitoring wells installed 7

Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 452

-- Highest concentration of Toluene (µg/l) 1030

-- Highest concentration of Ethylbenzene (µg/l) 164

-- Highest concentration of Xylene (µg/l) 2160

NA 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?

Two background soil samples were collected as part of initial investigation on October 19, 2023. Both background samples were collected at a depth of 6ft, which is comparable to the samples collected from along the pipeline. One background sample was collected from the northern (upstream) side of the pipeline, while the other background sample was taken from the southern (downstream) side of the pipeline. A third background sample was collected from MW01 which was advanced to characterize native soil and groundwater inorganic constituents.

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?

Further site investigation is required to delineate the extent of inorganic soil impacts.

## 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.

Impacted soil excavated from the point of release (POR) was removed and transported to Greenleaf Environmental. Additional soil impacts are proposed to be excavated and removed.

### 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.

On October 19 and 20, 2023, the point of release (POR) was exposed via excavation, and soil samples were collected from the base and sidewalls of the excavation area. In total, seven soil samples were collected from the excavation: two samples each were collected from the east and west sidewalls, one sample each was collected from the north and south sidewalls, and one soil sample was collected from the base. Groundwater was present at the base of the excavation at 8 feet below ground surface (bgs), and one water sample was collected for characterization. One composite soil sample was collected from stockpiled excavation material on site; this material was hauled to offsite disposal. Analytical results of initial investigation indicated organic and inorganic soil exceedances remaining at the base and sidewalls of the excavation area as well as organic and inorganic groundwater exceedances in the excavation area.

On January 6, 2025, Entrada provided drilling oversight for the advancement of seven soil borings and subsequent installation of seven monitoring wells (MW01 – MW07) at the Site. MW03 was advanced to delineate the extent of impacts vertically. MW02, MW04, MW05, MW06, and MW07 were advanced to delineate the extent of impacts horizontally. MW01 was advanced to characterize native levels of soil and groundwater inorganic constituents. Analytical results of soil boring investigation indicate that organic soil impacts are delineated but inorganic soil impacts remain undelineated. Soil borings were completed as groundwater monitoring wells, developed, and sampled. Analytical results of quarterly groundwater monitoring events indicate compliance with Table 915-1 allowable limits for four consecutive quarters. For this reason, UGC requests relief from quarterly groundwater monitoring obligations.

**Soil Remediation Summary**

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation ( or enhanced bioremediation )	Yes _____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) _____ 13
_____ 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**

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

Yes \_\_\_\_\_ Other \_\_\_\_\_ Undetermined at this time.

**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.

Seven groundwater monitoring wells were installed at the Site and have been monitored on a quarterly basis. As four consecutive quarters of compliant groundwater data has been achieved, UGC requests relief from quarterly monitoring obligations.

# 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.

This remediation will have minimal surface disturbance, any spot seeding will be communicated to the ECMC via Form 27 with attached diagram.

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. \_\_\_\_\_

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. 10/04/2023

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 10/05/2023

Proposed site investigation commencement. 10/18/2023

Proposed completion of site investigation. 12/31/2026

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 10/31/2023

Proposed date of completion of Remediation. 06/30/2026

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 dates have been adjusted to account for BLM stipulations.

**OPERATOR COMMENT**

This form has been submitted to provide results of Q4 2025 groundwater sampling, to request relief from quarterly groundwater monitoring obligations, and to satisfy the quarterly reporting requirement for Remediation Project Number 34209.

Form 27 Document 404095972 requesting alternative allowable limits for inorganic constituents is pending ECMC approval. Proposed alternative allowable limits are as follows: arsenic of 10.1 kg/mg, barium of 297 mg/kg, selenium of 0.996 mg/kg, SAR of 10.8, and EC of 9.6 mmhos/cm.

Additional excavation to remove impacted soil and delineate the extent of soil impacts is tentatively scheduled for Q2. See the attached Site Investigation Report and Laboratory Report for details of Q4 groundwater monitoring results.

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: 34209

**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**

404640413	SITE INVESTIGATION REPORT
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Total Attach: 1 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)