

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

KRIS NEIDEL

## 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 COGCC 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

### OPERATOR INFORMATION

Name of Operator: <u>WEXPRO COMPANY</u>	Operator No: <u>95960</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 45003</u>		Phone: <u>(307) 352-7561</u>
City: <u>SALT LAKE CITY</u>	State: <u>UT</u> Zip: <u>84145-0601</u>	Mobile: <u>(307) 371-3610</u>
Contact Person: <u>April Stegall</u>	Email: <u>april.stegall@dominionenergy.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 8641Initial Form 27 Document #: 2141609

#### PURPOSE INFORMATION

- |  |   |
|--|---|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water                              |
| <input checked="" type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure                  | <input checked="" type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                 | <input checked="" type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project                                  |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste                      | <input type="checkbox"/> Rule 906.c.: Director request  |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____  |

#### SITE INFORMATION

N Multiple Facilities ( in accordance with Rule 909.c. )

Facility Type: <u>PIT</u>	Facility ID: <u>100611</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>JACKS DRAW UNIT 13</u>	Latitude: <u>40.983888</u>	Longitude: <u>-108.284687</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSW</u>	Sec: <u>22</u>	Twp: <u>12N</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SCMost Sensitive Adjacent Land Use RANGELANDIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? No

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

NATURAL DRAINAGE APPROXIMATELY 80' FROM 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)

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	None	Visual inspection
Yes	SOILS	Minimal	see soil analysis
Yes	SURFACE WATER	NONE	VISUAL - LOCATION BELOW DRAINAGE
No	VEGETATION	None	Visual inspection

## INITIAL ACTION SUMMARY

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

A visual inspection was performed looking for signs of leaching pit components or stained soils that may have affected groundwater, surface water or vegetation, none were found. This pit was open, previously sampled and didn't meet Table 910-1 requirements. Approval was given by the BLM and COGCC to excavate the contaminated pit contents and haul them to a disposal facility.

## 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 ):

After approval to dig and haul the contamination to a disposal facility, pit contents were excavated by trackhoe and hauled to R360 (see attachments for disposal tickets) and soil samples of the excavated area were collected for analysis. The analysis after excavation showed exceedances for EC, SAR, Arsenic and TPH (E wall). The EC, SAR and Arsenic are not of concern, as the EC and SAR are below 3 feet, thus not affecting revegetation, and the area has been proven to have naturally high levels of arsenic. The E wall (failed for TPH) was excavated further and hauled, and another soil analysis from the area was obtained. Again, the sample failed for SAR and Arsenic. Please see attachments for disposal tickets, GPS information and analysis from all samples.

### Proposed Groundwater Sampling

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

No groundwater has been encountered during excavation.

### 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 4

Number of soil samples exceeding 910-1 4

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

Approximate areal extent (square feet) 460

### NA / ND

-- Highest concentration of TPH (mg/kg) 671

-- Highest concentration of SAR 63.6

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 13

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 910-1

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

Number of surface water samples exceeding 910-1

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?

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 414

Volume of liquid waste (barrels) 0

☐ 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.

Pit contaminants were excavated and hauled to R360 in LaBarge, WY, and the Rock Springs landfill in Rock Springs, WY.

## 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.

Wexpro Company has removed the contaminated material from the pit area and fenced the area to avoid intrusion by livestock or other wildlife. The pit area will be backfilled upon approval

## 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) \_\_\_\_\_ 414

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ 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.

NA, not necessary. Groundwater has not been encountered during sampling or excavation.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other As work is completed.

**Report Type:** ☐ Groundwater Monitoring ☒ Land Treatment Progress Report ☐ O&M Report

☐ Other \_\_\_\_\_

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes \_\_\_\_\_

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

N/A

Volume of E&P Waste (solid) in cubic yards 414

E&P waste (solid) description E&P contaminated waste, pit contents, produced water in soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: RS (Sweetwater County) landfill, R360

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description N/A

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes \_\_\_\_\_

Do all soils meet Table 910-1 standards? No \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? Yes \_\_\_\_\_

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? Yes \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? Yes \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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 pit will be backfilled to grade upon approval of this Form 27. Final reclamation of the previously P&A'd well pad will be completed after approval to backfill the pit.

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 approve the seed mix? Yes \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? Yes \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### **PRIOR DATES**

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, if known. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). \_\_\_\_\_

Date of commencement of Site Investigation. 08/25/2020 \_\_\_\_\_

Date of completion of Site Investigation. 08/25/2020 \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. \_\_\_\_\_

Date of completion of Remediation. 12/22/2020 \_\_\_\_\_

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

Wexpro Company requests approval to backfill the excavated pit area and perform final reclamation, as soil analysis now demonstrates compliance with Table 910-1 requirements (variance to not use 915 previously submitted). Wexpro requests closure and NFA of Facility 100611 and REM #8641 based on the attached site investigations and analytical results.

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

Signed: April Stegall

Title: Reclamation Agent

Submit Date: 02/17/2021

Email: april.stegall@dominionenergy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: KRIS NEIDEL

Date: 01/31/2022

Remediation Project Number: 8641

**Condition of Approval****COA Type****Description**

	It appears that SAR remains elevated in the former pit area, however, the surface of this location appears to be Federal, the operator shall comply with BLM Reclamation Rules.
	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required at the site.
2 COAs	

**Attachment Check 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**

402601922	FORM 27-SUPPLEMENTAL-SUBMITTED
402601983	DISPOSAL MANIFESTS
402602004	SITE INVESTIGATION REPORT
402602007	ANALYTICAL RESULTS
402602008	SITE INVESTIGATION REPORT
402602009	ANALYTICAL RESULTS

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)