

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>WEXPRO COMPANY</u>	Operator No: <u>95960</u>	Phone Numbers
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 #: 17173 Initial Form 27 Document #: 402614166

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: Request to backfill excavated contamination area and delineate remaining constituents.

SITE INFORMATION

☐ Yes ☐ Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: <u></u>	API #: <u>081-05569</u>	County Name: <u>MOFFAT</u>
Facility Name: <u>WILSON, F. 2</u>	Latitude: <u>40.991090</u>	Longitude: <u>-108.612980</u>	
** correct Lat/Long if needed: Latitude: <u></u>		Longitude: <u></u>	
QtrQtr: <u>NENE</u>	Sec: <u>22</u>	Twp: <u>12N</u>	Range: <u>100W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>PIPELINE</u>	Facility ID: <u>412315</u>	API #: <u></u>	County Name: <u>MOFFAT</u>
Facility Name: <u>HIAWATHA GATHERING PIPELINE SYSTEM 412315</u>	Latitude: <u></u>	Longitude: <u></u>	
** correct Lat/Long if needed: Latitude: <u></u>		Longitude: <u></u>	
QtrQtr: <u></u>	Sec: <u></u>	Twp: <u>12N</u>	Range: <u>100W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Non-cropland,
Oil and Gas

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? No

Other Potential Receptors within 1/4 mile

1690' from nearest water well, 1446' from nearest surface water

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	No groundwater encountered
Yes	SOILS	to be determined	soil analysis
No	SURFACE WATER	None	Visual inspection
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.

On 2/28/21, an operator discovered evidence of a spill (stained soil) on the surface. After investigation, it was determined that the source was a leaking buried gathering line on the well pad. The line was isolated and shut in, an emergency one call was completed and a crew was brought out to excavate the impacted material and place it on a liner in wait to be hauled to disposal.

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 composite soil sample of the impacted material was obtained, results will be submitted when recieved. After excavation of the contaminated material is finished, representative, discreet samples will be taken to confirm that all contamination has been removed.

Proposed Groundwater Sampling

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

Groundwater has not been encountered during excavation. If groundwater is encountered during excavation/remediation, COGCC will be notified immediately.

Proposed Surface Water Sampling

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

No surface water impacts, there is no surface water in close proximity of the spill or contaminated material.

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 22

Number of soil samples exceeding 915-1 22

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

Approximate areal extent (square feet) 0

-- Highest concentration of TPH (mg/kg) 3819

-- Highest concentration of SAR 24.4

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 1

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

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?

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

Volume of solid waste (cubic yards) 1026

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

The extent of the remaining EC and SAR impacts are unknown at this time. Please see attached soil map, summary and analysis. Wexpro Company is requesting approval to backfill the spill excavation and delineate remaining EC & SAR impacts.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The leaking gathering line has been isolated and repaired.

REMEDIAL ACTION 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.

Impacted material has been excavated and hauled to an approved disposal facility, R360 in LaBarage Wy. Please see attachments for disposal manifests.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 1026

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID #

_____ Natural Attenuation

_____ Other _____

_____ 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.

N/A, groundwater has not been encountered during excavation or remediation. If groundwater is encountered at any time during delineation of EC & SAR impacts, COGCC will be notified immediately.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly

☐ Semi-Annually

☐ Annually

☒ Other

As work is completed.

☐ 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 Excavation of impacted material

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:

soil impacted by condensate

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description soil containing condensate from
leaking gathering line

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

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

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION 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? No _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the COGCC 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.

After excavation and confirmation samples, Wexpro Company will backfill the excavation area with soil hauled in from Dickinson's gravel pit (commercial source). After the hole is backfilled to grade, the tank berm will be repaired and the tank will be re-placed. If the area needs to be seeded (outside of equipment area) the seed mix will be approved by the surface owner (BLM).

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? _____

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. _____

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. 02/28/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/28/2021

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

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

Wexpro Company requests approval to backfill the excavation at F Wilson 2 now that soil analysis meets COGCC requirements for TPH and all constituents except for Arsenic, EC & SAR. The area has been previously proven to have high levels of arsenic. EC & SAR are to be delineated at a later date. Please see attachments for soil analysis summary, analysis, sampling map and disposal manifests. Excavation will be backfilled upon approval.

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: 03/23/2022 _____

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: 03/24/2022 _____

Remediation Project Number: 17173 _____

Condition of Approval

COA Type

Description

	After collection of additional samples, the excavation may be backfilled.
	It is stated that, "The area has been previously proven to have high levels of arsenic." Local Arsenic appears to be very high, Background samples shall be collected at appropriate depths.
	The surface of this location appears to be Federal, the operator shall comply with BLM Reclamation Rules.
3 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.

<u>Att Doc Num</u>	<u>Name</u>
402874898	FORM 27-SUPPLEMENTAL-SUBMITTED
402874949	DISPOSAL MANIFESTS
402874952	DISPOSAL MANIFESTS
402874955	DISPOSAL MANIFESTS
402874958	DISPOSAL MANIFESTS
402874959	DISPOSAL MANIFESTS
402874961	DISPOSAL MANIFESTS
402874963	DISPOSAL MANIFESTS
402874966	DISPOSAL MANIFESTS
402874967	DISPOSAL MANIFESTS
402992574	ANALYTICAL RESULTS
402992575	ANALYTICAL RESULTS
402992576	ANALYTICAL RESULTS
402992577	ANALYTICAL RESULTS
402992578	ANALYTICAL RESULTS
402992579	ANALYTICAL RESULTS
402992580	SOIL SAMPLE LOCATION MAP
402992581	ANALYTICAL RESULTS

Total Attach: 18 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Tables do not summarize Organics, see lab data for Organics in COGCC table 915-1.	02/10/2022
Environmental	Table 915-1 Identifies TPH as C6-C36. Samples collected are for C6-C28. Prior to backfill, a sample shall be collected for TPH in the area of highest remaining impact, the area near S14-S18 (north west side of excavation).	02/10/2022

Total: 2 comment(s)