FORM 27 Rev 4/21

State of Colorado
Oil and Gas Conservation Commission

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

Document Number: 402976259
Receive Date: 03/08/2022
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 INFORMATON

Name of Operator: WEXPRO COMPANY Operator No: 95960
Address: P O BOX 45003
City: SALT LAKE CITY State: UT Zip: 84145-0601
Contact Person: April Stegall Email: april.stegall@dominionenergy.com

Phone Numbers
Phone: (307) 352-7561
Mobile: (307) 371-3610

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9792 Initial Form 27 Document #: 2526709

PURPOSE INFORMATION

- [X] 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.
- [X] Other: Submittal of 2021 SVE installation report

SITE INFORMATION

No Multiple Facilities

Facility Type: PIT Facility ID: 100382 API #: County Name: MOFFAT
Facility Name: B.W. MUSSER 11 Latitude: 40.922380 Longitude: -108.293429
** correct Lat/Long if needed: Latitude: 40.922440 Longitude: -108.293420
QtrQtr: SWSE Sec: 9 Twp: 11N Range: 97W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications: SC
Most Sensitive Adjacent Land Use: Rangeland, 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

729' FROM NATURAL DRAINAGE, 9671' FROM NEAREST WATER WELL

SITE INVESTIGATION PLAN

TYPE OF WASTE:

[X] **E&P Waste**	[X] **Other E&P Waste**	[ ] **Non-E&P Waste**
[X] Produced Water	[ ] Workover Fluids	
[ ] Oil	[ ] Tank Bottoms	
[ ] Condensate	[ ] Pigging Waste	
[ ] Drilling Fluids	[ ] Rig Wash	
[ ] Drill Cuttings	[ ] Spent Filters	
	[X] 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	See analysis	SOIL ANALYSIS
No	SURFACE WATER	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.

Pit was previously backfilled. Historic Google Earth imagery indicates that the pit would have been closed between 2006 and 2011.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Please see the attachment for proposed soil sampling.

Proposed Groundwater Sampling

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

A visual inspection was performed looking for signs of stained soil and potential leeching of pit components that may have impacted surface water or groundwater, none were found. Groundwater was not encountered during previous sampling. If groundwater is encountered during completion of delineation or remediation, COGCC will be contacted immediately.

Proposed Surface Water Sampling

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

A visual inspection was performed looking for signs of stained soil and potential leeching of pit components that may have impacted surface water or groundwater, none were found.

Additional Investigative Actions

[ ] Additional alternative investigative actions described in attached Site Investigation Plan (summary):

N/A

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 17
Number of soil samples exceeeding 915-1: 5
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet): 4622

NA / ND

-- Highest concentration of TPH (mg/kg): 9650
-- Highest concentration of SAR: 3.56
BTEX > 915-1: Yes
Vertical Extent > 915-1 (in feet): 30

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 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):
Volume of liquid waste (barrels):

[X] Is further site investigation required?

Based on analytical results, horizontally impacted soil is considered complete. Vertically impacted soil delineation is considered incomplete because impacted soil was observed to the depth of refusal at the center borehole and bedrock was not recovered to confirm refusal occurrred at the bedrock surface. Please see the attached plan for proposal to complete delineation.

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 was been previously decommissioned and backfilled.

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.

Please see the attachment for SVE installation information.

Soil Remediation Summary

☐ **In Situ**

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

☐ **Ex Situ**

_____ Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) _____

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.

N/A, there is no indication that groundwater was impacted. If groundwater is encountered during delineation or remediation, COGCC will be notified immediately.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Wexpro to follow COGCC reporting reccomendations.

☒ **Request Alternative Reporting Schedule:**

☒ Semi-Annually ☐ Annually ☐ Other Wexpro requests semi-annual reporting due to the large amount of remediation projects. Wexpro Company requests that this remediation project be scheduled for Q2 and Q4 reporting until it is closed.

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 SVE system.

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

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&P waste (liquid) description

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? 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? 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.

To be determined after delineation and remediation have been completed and soils meet Table910-1 standards.
Reclamation will follow COGCC and Federal requirements.

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.

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 08/10/2017

Proposed completion of site investigation. 08/10/2017

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

Please see the 2021 site investigation/SVE installation information provided by Golder Associates (WSP).

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: 03/08/2022 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: 12/19/2022

Remediation Project Number: 9792

COA Type	Description
	It appears that the feasibility portion of this project is complete, COGCC approves the implementation of this SVE system.
	The following is required when starting the SVE system: anticipated life of system, start date, general hours of operation, schedule for cycling the wells (to prevent channeling of soil).
	Addition of an SVE well to fill the gap on radius of influence is approved.
	COGCC acknowledges the assumption that the encountered water was a result of using the pit. If it is determined that fluid is to be removed, it shall be disposed of as E&P waste.
	This report estimates the ability of an SVE system to remove volatile end of TPH and assumes that semi-volatiles will remain to be below COGCC standards. The operator is responsible for attaining 500 mg/kg TPH for closure without a variance. (Sample P3-B7-29-31FT, may be a challenge)
5 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
402976259	FORM 27-SUPPLEMENTAL-SUBMITTED
402976278	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

User Group	Comment	Comment Date
Environmental	Per the results of the water sample, COGCC concurs that the water appears to be E&P waste. The main Contaminate for Concern in water appears to be BTEX. Chlorides and Sulfates appear low and not driving factor in remediation.	12/19/2022
Environmental	SAR levels appear low at this site (none in exceedance of 915-1).	12/19/2022

Total: 2 comment(s)