

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

403986399

Receive Date:

01/14/2025

Report taken by:

John Heil

Site Investigation and Remediation Workplan (Initial 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
Contact Person: Dana Pollack		Mobile: ()
Email: dpollack@utahgascorp.com		

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39627 Initial Form 27 Document #: 403986399

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: SPILL OR RELEASE	Facility ID: 487360	API #: _____	County Name: RIO BLANCO
Facility Name: Hill 9-31 Pipeline Leak		Latitude: 40.096434	Longitude: -108.772215
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: NESW	Sec: 31	Twp: 2N	Range: 101W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Private Surface

Is domestic water well within 1/4 mile? Yes 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

The spill/release occurred within 1/4 mile to three water wells. UGC has reviewed the water well data, and the data shows groundwater to be within 10ft of the surface.

The spill/release occurred within 1/4 mile to the White River (approx. 643ft).

The spill/release occurred within 1/4 mile to CPW Parks and Wildlife Aquatic Native Species Conservation Waters, Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area.

The spill/release occurred within CDPHE Regulation 42 Limited Use and Quality Zone.

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	SOILS	Unknown	Soil Sampling Under Table 915

INITIAL ACTION SUMMARY

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

Utah Gas Corp was alerted to a spill/release on Saturday July 6th by the associated landowner. The pipeline connecting the Hill 9-31 well to the associated tank facility had failed at the 3'oclock position on the east side of the pipeline. Approximately 1 bbl of fluid daylighted from the subsurface.

Initial actions included, turning off the Hill 9-31 well, and shutting in the line. UGC immediately called Badger Daylighting services to use their hydrovac truck to remove the spilled fluid from the surface. The hydrovac company had removed all spilled fluid at the surface by the end of the day 7/6/2024. The following Monday (7/8/2024), UGC personnel excavated the site and collected soil samples. During this time, the line was also repaired.

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):

The following soil samples were collected as apart of the initial site investigation on 7/8/2024: Pipeline Leak N1, S1, E1, W2, and BOT. These samples were tested for constituents under Table 915.

A second round of soil sampling and site excavation took place on 8/5/2024. The following samples were collected: S2, W2, BGE and BGSE. These samples were also tested for constituents under Table 915.

Proposed Groundwater Sampling

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

If groundwater is intercepted during site investigation, a sample will be collected and analyzed for constituents outlined in Table 915.

Groundwater is anticipated to be within 10-15ft of the surface.

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):

Additional site investigation is required to fully delineate EC impacts to the soil. UGC plans to further excavate this location and collect grab samples to be analyzed for EC.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 9

-- Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 6

-- Highest concentration of SAR 26

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

BTEX > 915-1 No

Approximate areal extent (square feet) 96

Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? No

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

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?

Background samples were collected as apart of this project. Two background samples were collected, BGE and BGSE, Taken at a depth of 1ft.

UGC previously requested the consideration of background samples form other nearby remediation projects, and this request was approved in the associated Form 19.

☐ 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 fully delineate the EC at the spill/release point.

REMEDIAL ACTION PLAN**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

All impacted material excavated from the spill/release site was hauled away to an offsite disposal facility. Clean dirt was brought back into the replace what was 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.

UGC plans to further excavate the spill/release point to attempt to delineate the extent of impact of EC. UGC will also collect additional background samples at depth. All excavated material will be hauled away to an offsite disposal facility.

Soil Remediation Summary☐ In Situ☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 24

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC 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.

UGC understands that the excavation is within close proximity to groundwater. If groundwater is intercepted during site investigation and excavation, a sample will be collected and analyzed for constituents under Table 915. The sample results will be communicated to the ECMC via Form 27's.

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.

Operator anticipates the remaining cost for this project to be: \$

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:

Contaminated soils were generated as apart of this remediation project. UGC has hauled impacted soils away to an offsite disposal facility (LaPoint Recycling).

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:

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.

Since the spill/release occurred in a private landowner's driveway, UGC has replaced the gravel removed during initial spill/release clean-up.

Is the described reclamation complete? Yes

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. 07/06/2024

Actual Spill or Release date, or date of discovery. 07/06/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/06/2024

Proposed site investigation commencement. 07/08/2024

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/08/2024

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

Utah Gas Corp plans to excavate and collect additional samples to fully delineate EC at this remediation location. UGC is working with the landowner to allow access to collect these samples.

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

Signed: Dana Pollack

Title: Environmental Specialist

Submit Date: 01/14/2025

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: John Heil

Date: 03/20/2025

Remediation Project Number: 39627

COA Type**Description**

	Comply with all outstanding COAs.
1 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**

403986399	FORM 27-INITIAL-SUBMITTED
404056848	ANALYTICAL RESULTS
404056849	ANALYTICAL RESULTS
404056850	ANALYTICAL RESULTS
404056851	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)