

State of Colorado Oil and Gas Conservation Commission

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401196609

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Report taken by:

RICK ALLISON

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>PDC ENERGY INC</u> | Operator No: <u>69175</u> | Phone Numbers |
| Address: <u>1775 SHERMAN STREET - STE 3000</u> | | Phone: <u>(303) 860-5800</u> |
| City: <u>DENVER</u> | State: <u>CO</u> | Zip: <u>80203</u> |
| Contact Person: <u>Karen Olson</u> | Email: <u>Karen.Olson@pdce.com</u> | Mobile: <u>()</u> |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9568 Initial Form 27 Document #: 2615218

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input checked="" 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 type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input 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>LOCATION</u> | Facility ID: <u>331302</u> | API #: _____ | County Name: <u>WELD</u> |
| Facility Name: <u>WILLIAMSON-66N65W 12NESE</u> | | Latitude: <u>40.498560</u> | Longitude: <u>-104.603530</u> |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>NESE</u> | Sec: <u>12</u> | Twp: <u>6N</u> | Range: <u>65W</u> |
| Meridian: <u>6</u> | | Sensitive Area? <u>Yes</u> | |

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use CROP LAND

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

residence is located approximately 1,275' south of the location. The nearest surfacewater is 1,470' north and the nearest water well is 850' southwest. No other water wells are located within a 1/4-mile radius. Depth to groundwater is approx. 13 feet bgs

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 |
|-----------|----------------|------------------------------------|-------------------------------------|
| | GROUNDWATER | Refer to the attached Figure 3 and | Excavation and groundwater sampling |
| Yes | SOILS | Refer to the attached Figure 2 and | Excavation and soil sampling |

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 February 18, 2016, a historic release was discovered below the produced water vessel during plug and abandonment activities at the Williamson 43-12 production facility. Excavation activities were summarized in an Initial Form 19 submitted on February 19, 2016 (Doc # 400992777) and a Supplemental Form 19 submitted on February 26, 2016 (Doc # 400996105). A topographic map of the site is included as Figure 1.

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):

Proposed Groundwater Sampling

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

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 0
Number of soil samples exceeding 910-1
Was the areal and vertical extent of soil contamination delineated?
Approximate areal extent (square feet)

NA / ND

 Highest concentration of TPH (mg/kg)
 Highest concentration of SAR
 BTEX > 910-1
 Vertical Extent > 910-1 (in feet)

Groundwater

Number of groundwater samples collected 7
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 7'
Number of groundwater monitoring wells installed 7
Number of groundwater samples exceeding 910-1 0

-- Highest concentration of Benzene (µg/l) 3.1
ND Highest concentration of Toluene (µg/l)
ND Highest concentration of Ethylbenzene (µg/l)
-- Highest concentration of Xylene (µg/l) 4.5
NA 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) Volume of liquid waste (barrels)

☒ Is further site investigation required?

Based on soil analytical data, the extent of soil impacts was successfully delineated and removed during excavation activities. However, the extent of dissolved phase impacts on site has not yet been determined. As such, PDC will install temporary monitoring wells within and adjacent to the former excavation area. Soil analytical data is summarized in Table 1 and groundwater analytical data is summarized in Table 2. The laboratory analytical reports are included as Attachment A.

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.

Between February 18 and March 8, 2016, approximately 1,450 cubic yards of impacted material were removed and transported to the Waste Management Facility in

Ault, Colorado for disposal under PDC waste manifests. Soil samples collected from the sidewalls of the final excavation extent exhibited constituent concentrations

below COGCC Table 910-1 soil standards. Groundwater was encountered in the excavation area at approximately 13 feet below ground surface (bgs).

Approximately 550 barrels of groundwater were removed from the excavation area using a vacuum truck and transported to a licensed water disposal facility. The

groundwater sample (GW01) collected from the excavation area exhibited benzene concentrations in exceedance of COGCC Table 910-1 groundwater standards at

a detection of 5.1 mg/l. The excavation extent and soil and groundwater sample locations are illustrated on Figure 2. Soil analytical data is summarized in Table 1

and groundwater analytical data is summarized in Table 2. The laboratory analytical reports are included as Attachment A.

A No Further Action (NFA) request was submitted to the COGCC via a Supplemental Form 19 on March 15, 2016 (Doc# 401004170). In response, the COGCC

requested additional site investigation to determine the extent of possible remaining dissolved phase hydrocarbon impacts.

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.

Monitored natural attenuation (MNA) was selected as the remediation strategy for this site during the second quarter 2016 and will remain as the selected remediation strategy for the site through the first quarter 2017. Quarterly groundwater monitoring will be completed until four consecutive quarters of BTEX concentrations in compliance with regulatory standards are achieved.

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.

Groundwater samples will be collected from the five (5) temporary monitoring wells and submitted to Summit Scientific Laboratories for analysis benzene, toluene, ethylbenzene, total xylenes (BTEX) by USEPA Method 8260. Should analytical results indicate BTEX concentrations are below COGCC Table 910-

1 standards in the five (5) temporary wells, a NFA request will be submitted to the COGCC. However, should analytical results indicate an exceedance in regulatory standards, quarterly groundwater monitoring will be initiated. PDC will conduct quarterly groundwater monitoring at the temporary well locations until BTEX concentrations are in compliance with COGCC Table 910-1 standards for four consecutive quarters.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

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? No

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: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

Do all soils meet Table 910-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

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

Does Groundwater meet Table 910-1 standards? _____

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 excavation area was backfilled, compacted, and re-contoured to match pre-existing conditions. The decommissioned facility location was reclaimed in accordance with COGCC 1004 Series rules. Subsequent to attainment of closure, the temporary monitoring wells will be plugged and abandoned.

Is the described reclamation complete? _____

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? _____

If NO, does the seed mix comply with local soil conservation district recommendations? _____

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). 02/18/2016

Date of commencement of Site Investigation. 02/18/2016

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/21/2016

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

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

Signed: Karen Olson

Title: Senior EHS Manager

Submit Date: 01/30/2017

Email: Karen.Olson@pdce.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: RICK ALLISON

Date: 02/04/2017

Remediation Project Number: 9568

COA Type

Description

| | |
|--|--|
| | |
|--|--|

Attachment Check List

Att Doc Num

Name

| | |
|-----------|--------------------------------|
| 401196609 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 401196610 | MONITORING REPORT |

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)