

# 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:

401480257

Receive Date:

12/18/2017

Report taken by:

RICK ALLISON

## 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 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>	<b>Phone Numbers</b>
Address: <u>1775 SHERMAN STREET - STE 3000</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>			Phone: <u>(303) 860-5800</u>
			Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 10839Initial Form 27 Document #: 401480257

#### 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>331084</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SETH-65N64W 19NWNE</u>		Latitude: <u>40.390095</u>	Longitude: <u>-104.590436</u>
		** correct Lat/Long if needed: Latitude: <u>40.386229</u>	Longitude: <u>-104.583814</u>
QtrQtr: <u>NWNE</u>	Sec: <u>19</u>	Twp: <u>5N</u>	Range: <u>64W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use AgricultureIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? Yes

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

An irrigation pond is located approximately 85 feet northeast of the location. Occupied housing is located approximately 295 feet south east of the location.

# 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	Not defined.	Completion of Site Investigation Plan.
No	SOILS	Refer to Figure 1 and Table 1.	Completion of excavation activities.

## INITIAL ACTION SUMMARY

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

Between October 3 and October 12, 2017, excavation oversight and confirmation sampling were conducted following the removal of the produced water vessel as the Seth 1, 5 production facility. Approximately 50 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests.

## 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 ):

As required by the COGCC Rule 905.B, one (1) soil sample (SS01) was collected at 4 feet below ground surface (bgs) from the excavation sidewall which exhibited the highest field screened volatile organic compound (VOC) concentration measured by a photoionization detector (PID). The soil sample was submitted to Summit Scientific Laboratories (Summit) in Golden, Colorado for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by USEPA Method 8260B, and TPH - diesel range organics (DRO) by USEPA Method 8015. Analytical results indicated that constituent concentrations were below the applicable COGCC Table 910-1 standards in the soil sample location. The excavation extent and soil sample locations are illustrated on Figure 1. Soil analytical results are summarized in Table 1.

### Proposed Groundwater Sampling

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

Groundwater was encountered in the excavation at approximately 5 feet bgs. On October 12, 2017, one groundwater sample (GW01) was collected from the excavation following vacuum recovery events. The groundwater sample was submitted to Summit Scientific Laboratories for analysis of BTEX, by USEPA Method 8260B. Analytical results indicated that constituent concentrations were below applicable COGCC regulatory groundwater standards. The groundwater sample location is illustrated on Figure 1 and analytical results are summarized in Table 2.

### 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 ):

Five (5) temporary monitoring wells will be installed via direct push drilling methods to confirm dissolved-phase hydrocarbon concentrations are below regulatory standards within and surrounding the former excavation extent. Proposed monitoring well locations are illustrated on Figure 2.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 1

Number of soil samples exceeding 910-1 0

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

Approximate areal extent (square feet) 100

### NA / ND

ND Highest concentration of TPH (mg/kg)           

NA Highest concentration of SAR           

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 5'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

ND Highest concentration of Benzene (µg/l)           

ND Highest concentration of Toluene (µg/l)           

ND Highest concentration of Ethylbenzene (µg/l)           

ND Highest concentration of Xylene (µg/l)           

NA Highest concentration of Methane (mg/l)           

### Surface Water

0 Number of surface water samples collected

0 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) 50

Volume of liquid waste (barrels) 135

☒ Is further site investigation required?

Temporary monitoring wells will be installed to confirm that dissolved-phase petroleum hydrocarbon impacts are not present on site. Proposed monitoring well locations are illustrated on Figure 2.

# REMEDIAL ACTION PLAN

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Between October 3 and October 12, 2017, approximately 50 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests. As previously described, the confirmation soil sample collected from the final extent of the excavation indicated hydrocarbon impacts within the unsaturated interval were successfully removed by excavation activities.

## 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.

Five (5) temporary monitoring wells will be installed via direct push drilling methods in all cardinal directions of the former excavation extent. A remediation strategy may be selected for the site following the evaluation of groundwater analytical results.

## 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.

Based on the analytical data collected during the initial site investigation, PDC proposes conducting one quarter of groundwater monitoring at the five (5) proposed monitoring wells. Should analytical results indicate BTEX concentrations are below COGCC Table 910-1 standards, PDC will request a No Further Action (NFA) determination for this site.

## 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? Yes

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

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 50

E&P waste (solid) description E&P contaminated soil.

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

Non-COGCC Disposal Facility: North Weld Waste Management Facility

Volume of E&P Waste (liquid) in barrels 135

E&P waste (liquid) description Groundwater

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

Non-COGCC Disposal Facility: licensed 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.

The excavation area was backfilled, compacted, and re-graded to match pre-existing conditions. The produced water vessel and associated production infrastructure were decommissioned following excavation activities.

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 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). 10/03/2017

Date of commencement of Site Investigation. 10/03/2017

Date of completion of Site Investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/03/2017

Date of completion of Remediation. \_\_\_\_\_

### SITE RECLAMATION DATES

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

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

### OPERATOR COMMENT

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: 12/18/2017

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: 01/04/2018

Remediation Project Number: 10839

### COA Type

### Description

--	--

## **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

401480257	FORM 27-INITIAL-SUBMITTED
401480433	ANALYTICAL RESULTS
401483729	SITE INVESTIGATION PLAN
401483732	SITE MAP

Total Attach: 4 Files

## **General Comments**

### User Group

### Comment

### Comment Date

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

Total: 0 comment(s)