

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

PETER GINTAUTAS

## 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>	<b>Phone Numbers</b>
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>	Mobile: <u>( )</u>
Contact Person: <u>Karen Olson</u>		Email: <u>COGCCSpillRemediation@pdce.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 12692Initial Form 27 Document #: 401962147

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input 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 checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                 | <input checked="" 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>336537</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>WARNER W-62N66W 14NWNE</u>		Latitude: <u>40.143800</u>	Longitude: <u>-104.741860</u>
		** correct Lat/Long if needed: Latitude: <u>40.141678</u>	Longitude: <u>-104.740356</u>
QtrQtr: <u>NWNE</u>	Sec: <u>14</u>	Twp: <u>2N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

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

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

The following additional receptors were evaluated and determined to be outside of the 1/4-mile radius of the site: occupied building, CPW Sensitive Wildlife Habitat (SWH), and FWS wetlands.

## 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
UNDETERMINED	SOILS	TBD	Confirmation 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.

In accordance with COGCC Rule 905.b, confirmation samples will be collected below the buried or partially buried produced water vessel during decommissioning or relocation activities.

### 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 ):

Soil encountered below the produced water vessel will be field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). In addition, visual and olfactory observations of the soil will be documented. A confirmation soil sample will be collected below the vessel and submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) – gasoline range organics (GRO) by EPA Method 8260B, TPH – diesel range organics (DRO) by EPA Method 8015, pH by EPA Method 9045, and electrical conductivity (EC) by Standard Method (SM) 2510B.

#### Proposed Groundwater Sampling

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

If groundwater is encountered below the vessel, a groundwater sample will be collected and submitted for laboratory analysis of BTEX by EPA Method 8260B.

#### 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 61

Number of soil samples exceeding 910-1 6

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

Approximate areal extent (square feet) 18375

### NA / ND

-- Highest concentration of TPH (mg/kg) 890

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 18

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 10'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

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 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?

Excavation activities were conducted off-site to the east of the facility. Soil samples collected from the final excavation extent indicated that hydrocarbon impacted material was successfully removed.

☐ 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) 6410

Volume of liquid waste (barrels) 73

☒ Is further site investigation required?

Groundwater was encountered in the excavation at approximately 10 feet below ground surface (bgs). However, a groundwater sample could not be collected due to slow and discontinuous aquifer recharge. Therefore, a supplemental groundwater assessment will be conducted within and surrounding the former excavation extent.

# 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.

On April 24, 2019, confirmation soil sampling was conducted during the removal of the produced water vessel. During facility decommissioning activities, a historic release was discovered below the production lines. Between April 24 and June 5, 2019, approximately 6,410 cubic yards of impacted material were removed and transported to the Buffalo Ridge Landfill for disposal under PDC waste manifests. Soil samples collected from the final extent of the excavation indicated that hydrocarbon impacted material was successfully 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.

In July 2019, a supplemental site investigation was conducted to determine if shallow groundwater was present below the former excavation area. Eight boreholes (BH01 - BH08) were advanced via hollow stem auger drilling methods to depths ranging between 18.5 and 29 feet below ground surface (bgs). Lithologic descriptions and volatile organic compound (VOC) using a photoionization detector (PID) were collected for each borehole. Fourteen soil samples were collected from the boreholes and submitted to Summit Scientific Laboratories in Golden, Colorado for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by EPA Method 8260B, and TPH - diesel range organics by EPA Method 8015. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 910-1 soil standards in all soil sample locations. Saturated soils were not observed in any of the boreholes, however temporary monitoring wells were installed to confirm groundwater was not present. Monitoring well locations are illustrated on Figure 1. Soil analytical results are summarized in Table 1 and 2. The laboratory reports are included in Attachment A. The soil boring logs and well construction details are provided in Attachment B.

## Soil Remediation Summary

☐ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

☒ Ex Situ

Yes \_\_\_\_\_ Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 6410  
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.

In July 2019, eight (8) monitoring wells (BH01 - BH08) were installed to determine if shallow groundwater was present below the former excavation area. On August 7 and August 22, 2019, groundwater gauging events were conducted to determine if groundwater was present in any of the eight monitoring wells. Groundwater was measured in only BH01, therefore the well was subsequently developed and sampled on August 22, 2019. The groundwater sample was submitted to Summit Scientific Laboratories for analysis of BTEX by EPA Method 8260B. Analytical results indicated that BTEX concentrations were below the applicable COGCC Table 910-1 groundwater standards. Based on the analytical results and absence of groundwater in the remaining seven monitoring wells. PDC is requesting a No Further Action (NFA) determination for the remediation project.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other No Further Action (NFA) Request

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report  
☒ Other No Further Action (NFA) Request

### 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 reuse.

Volume of E&P Waste (solid) in cubic yards 6410

E&P waste (solid) description E&P Contaminated Soil

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

Non-COGCC Disposal Facility: Buffalo Ridge Landfill

Volume of E&P Waste (liquid) in barrels 73

E&P waste (liquid) description E&P Contaminated Groundwater

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

Non-COGCC Disposal Facility: NGL Energy Facility

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

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? Yes

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 facility was decommissioned. Following remediation activities, the excavation was backfilled and re-graded to match pre-existing conditions. The location will be reclaimed in accordance with COGCC 1000 Series rules.

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). 03/18/2019

Date of commencement of Site Investigation. 04/24/2019

Date of completion of Site Investigation. 08/22/2019

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 04/24/2019

Date of completion of Remediation. 08/22/2019

### **SITE RECLAMATION DATES**

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

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

**OPERATOR COMMENT**

Based on the soil and groundwater data collected during the supplemental site investigation, hydrocarbon impacts do not remain below the former excavation area. Consequently, PDC Energy is requesting a No Further Action (NFA) determination for this remediation project.

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 Program Manager

Submit Date: ` 09/06/2019

Email: COGCCSpillRemediation@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: PETER GINTAUTAS

Date: 09/06/2019

Remediation Project Number: 12692

**COA Type****Description**

	Based on the information presented, it is concluded that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or further remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
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**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**

402166150	FORM 27-SUPPLEMENTAL-SUBMITTED
402166878	LOGS
402167795	ANALYTICAL RESULTS
402167796	GROUND WATER SAMPLE LOCATION

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)