

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

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 6926 Initial Form 27 Document #: 2223637

#### 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 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>331069</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SEELE-64N67W 31NWNE</u>		Latitude: <u>40.275890</u>	Longitude: <u>-104.930170</u>
		** correct Lat/Long if needed: Latitude: <u>40.276883</u>	Longitude: <u>-104.923421</u>
QtrQtr: <u>NWNE</u>	Sec: <u>31</u>	Twp: <u>4N</u>	Range: <u>67W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

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

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

SURFACE WATER ~1100' N, RESIDENTIAL BUILDINGS ~1000' S, DITCH 80' E, DEPTH TO GRNDWTR 7' 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 FORM 19	GROUNDWATER SAMPLING
	SOILS	REFER TO FORM 19	EXCAVATION, GEOPROBLING, 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.

THE IMMEDIATE RESPONSE ACTION WAS PROVIDED IN A FORM 19 SUBMITTED ON FEBRUARY 27, 2012. AN AERIAL MAP OF THE SITE IS INCLUDED ON 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 4  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 9'  
Number of groundwater monitoring wells installed 6  
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  
           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?

THE GROUNDWATER PLUME HAS BEEN DELINEATED AND NO FURTHER SUBSURFACE INVESTIGATION IS REQUIRED AT THE SITE. LAB ANALYTICAL RESULTS FROM GROUNDWATER AND SOIL SAMPLES THAT WERE COLLECTED DURING EXCAVATION AND GEOPROBING ACTIVITIES INDICATE THAT MODERATE HYDROCARBON IMPACTS EXIST OUTSIDE THE EXTENT OF THE PREVIOUS EXCAVATION. THE LAB ANALYTICAL RESULTS ARE PROVIDED IN TABLE 1 AND THE TEMPORARY MONITORING WELL LOCATIONS ARE ILLUSTRATED ON FIGURE 2.

# 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.

The source area was previously excavated as described in the Form 19 submitted on February 27, 2012.

## 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.

EFR/AS was reinitiated during the second quarter 2016 due to a rebound in dissolved-phase hydrocarbon concentrations. EFR/AS will remain the selected remediation strategy for the site through the third quarter 2020. 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  
Yes \_\_\_\_\_ 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.

Quarterly groundwater monitoring will continue at the eight monitoring wells (BH01R-BH03R and BH07-BH11) to assess the dissolved-phase petroleum hydrocarbon impacts in groundwater using USEPA Method 8260B. Groundwater sampling will continue until four consecutive quarters of groundwater monitoring data indicate that BTEX concentrations are in compliance with the COGCC Table 910-1 groundwater standards.

## 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 AREA WHERE THE EXCAVATION IS LOCATED IS USED AS THE PRODUCED WATER AND CONDENSATE TANK SECONDARY CONTAINMENT AREA AND PARTIALLY AS AN EQUIPMENT ACCESS AREA TO THE TANK BATTERY LOCATION AND CONSISTS OF ROAD BASE. THE EXCAVATION HAS BEEN BACKFILLED AND COMPACTED WITH CLEAN MATERIAL AND THE GROUND SURFACE WAS CONTOURED TO MATCH PRE-EXISTING CONDITIONS.

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). \_\_\_\_\_

Date of commencement of Site Investigation. 01/09/2012

Date of completion of Site Investigation. 01/27/2012

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 01/09/2012

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

### SITE RECLAMATION DATES

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

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

### OPERATOR COMMENT

Per the Notice to Operators (NTO) issued on April 24, 2020, this remediation project meets the criteria outlined in the referenced guideline for a modified groundwater monitoring plan. Dissolved-phase hydrocarbon impacts related to the January 2012 release were successfully delineated within the existing monitoring well network utilizing the eight monitoring wells (BH01R - BH03R, and BH07 - BH11). Historic groundwater analytical results indicate that point of compliance has been established in all cardinal directions and the dissolved-phase BTEX plume is stable and not migrating off site. EFR/AS will continue as the selected remediation strategy through the third quarter 2020. Based on this criteria, PDC is requesting a reduction in groundwater monitoring and reporting from a quarterly to semi-annual schedule.

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: 05/26/2020

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: 05/26/2020

Remediation Project Number: 6926

### COA Type

### Description

	Submit reports of site investigation and progress of remediation including results of sampling and analysis on an annual basis or more often until remediation is closed.
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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

402404623	FORM 27-SUPPLEMENTAL-SUBMITTED
402404749	MONITORING REPORT

Total Attach: 2 Files

### General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)