

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

## 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: DCP OPERATING COMPANY LP	Operator No: 4680	<b>Phone Numbers</b>
Address: 370 17TH STREET - SUITE 2500		Phone: (970) 3786393
City: DENVER State: CO Zip: 80202		Mobile: (970) 9390329
Contact Person: Chandler Cole	Email: cecole@dcpmidstream.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 14898

Initial Form 27 Document #: 402282471

#### 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 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 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: SPILL OR RELEASE	Facility ID: 469293	API #: _____	County Name: WELD
Facility Name: SPILL/RELEASE POINT	Latitude: 40.267356	Longitude: -104.735617	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 35	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Agriculture  
farmland and an  
irrigation ditch to  
the north of the  
Site.

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? No

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

The Colorado Division of Water Resources Water Well Database was consulted for depth to groundwater around the Site. The nearest registered water well (Permit #141254) has a noted static water level of 107 feet below ground surface. However, another registered water well (Permit #34070-MH), located approximately 1,650 feet southwest of the spill area has a noted static water level of 21 feet below ground surface.

# 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	180' X 40'	soil sample analysis

## 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 release was discovered on November 17, 2019 when Operations noticed a drain valve on a condensate stabilizer re-boiler was leaking by to the produced water sump and overflowing the sump with a mixture of condensate and produced water. Operations immediately actuated the valve stopping the release. A vac truck was quickly deployed to remove the liquids within the sump and on the ground. Due to consistent freezing temperatures subsequent to the release, further Site investigation and remediation activities were delayed due to a thick frost layer. A Site Investigation was completed on May 13, 2020 to assist in defining the extent of the impacted soils area. Soil borings were advanced at locations illustrated on Figure 2 and the results were provided in the approved Form 27 (Document# 402500881). In December 2020, the initial environmental remediation and excavation activities were performed at the Site and further details are provided within this Form 27 Supplemental. DCP is currently coordinating additional steps necessary to complete the environmental remediation activities at the Site and will update the COGCC accordingly.

## 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 ):

During the initial test pitting and excavation activities to remove impacted soils in December 2020, grab soil samples were collected to determine the horizontal and vertical extents of impacts remaining in the soil that were either above or below the applicable COGCC Table 910-1 standards. Soil samples collected from the base and sidewalls of the test pits and excavation extents were submitted for analysis of BTEX and TPH-GRO/DRO. The December 2020 soil sample locations and the laboratory results are illustrated on Figure 2 and presented in Table 1. The laboratory reports are also attached to this Form 27. Following supplemental remediation activities described herein, confirmation soil samples will be collected, and the data will be presented to the COGCC in subsequent reports.

### Proposed Groundwater Sampling

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

No evidence of groundwater was encountered during the initial soil boring investigations completed in May 2020. However, during the December 2020 excavation activities, groundwater seepage was observed in the bottom of the excavation area at approximately 20 feet below ground surface. Due to the soil type and the depth of the occurrence, a representative groundwater sample was not collected. Following additional remediation activities, DCP plans to present a groundwater investigation and monitoring program workplan to the COGCC.

### Proposed Surface Water Sampling

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

The FRICO owned Platte Valley Canal is located approximately 80 feet north of the northeast corner of the Mewbourn Gas Plant facility boundary. During the December 2020 remediation activities, surface water was not observed within the canal and a surface water sample has not been collected. DCP is coordinating with FRICO to receive access approval for possible investigation efforts within the right of way for the canal.

## Additional Investigative Actions

☐ Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

Analytical results from the December 2020 investigation reported 27 out of 37 samples were below the applicable COGCC Table 910-1 standards. Impacted soils were removed via mechanical excavation, hydrovacuum excavation, and /or hand shoveling methods. Further excavation to the south beyond the extents illustrated on Figure 2 was deemed unsafe due to proximity of facility infrastructure and excavation depth. Proposed investigation and remediation activities to the south of the excavation footprint presented on Figure 2 will be provided to the COGCC in a supplemental Form 27.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 37

Number of soil samples exceeding 910-1 19

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

Approximate areal extent (square feet) 240

### NA / ND

-- Highest concentration of TPH (mg/kg) 3980

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 20

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) \

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 910-1

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?

☐ 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) 2000

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

As described in the Proposed Soil Sampling and and Proposed Groundwater Sampling SectionS of this Report.

# 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.

DCP is currently coordinating to perform additional remediation activities at the Site contingent on right of way access approval from FRICO for the Platte Valley Canal. During the excavation activities in December 2020, approximately 2,000 cubic yards (yd3) of material was removed for disposal. Soil samples from the southeast, southwest, and northwest sidewalls of the excavation indicate that impacted shallow soil above 16 feet bgs has been removed. Based on the samples collected from the southeast wall, additional impacted material remains below 16 feet bgs. However, due to the proximity to facility infrastructure, the remaining source material at that location may require in-situ remediation. Once a point to the south was reached that further excavation could no longer be performed safely, the southern portion was backfilled and excavation efforts were focused to the north. Excavation was postponed once the northern extents reached the facility boundary due to proximity to the FRICO right of way. DCP is currently coordinating with FRICO to gain access within their right of way, if required. Once access is granted, DCP will continue with investigation/remediation activities to the north, outside of the gas plant boundary. Impacted soils have been disposed of at the Waste Management Buffalo Ridge Landfill.

## 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.

The release was discovered on November 17, 2019 when Operations noticed a drain valve on a condensate stabilizer re-boiler was leaking by to the produced water sump and overfilling the sump with a mixture of condensate and produced water. Operations immediately actuated the valve stopping the release. A vac truck was quickly deployed to remove the liquids within the sump and on the ground. Due to consistent freezing temperatures after the release, further Site investigation and remediation activities were delayed due to a thick frost layer. A Site Investigation was completed on May 13, 2020 to assist in defining the extents of the impacted soils vertically and horizontally. Impacted soils encountered during the December 2020 excavation were removed via mechanical and hydrovacuum excavation, and/or hand shoveling near facility infrastructure. Once DCP receives approval for accessing the FRICO right of way, additional investigation and remediation activities will be performed to the north of the gas plant facility. DCP will subsequently provide the results of the those activities, in addition to a groundwater investigation and remediation workplan, in a supplemental Form 27 for COGCC review.

## 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) 2000  
☐ 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

☐ No Bioremediation ( or enhanced bioremediation )  
☐ No Chemical oxidation  
☐ No Air sparge / Soil vapor extraction  
☐ No Natural Attenuation  
☐ No 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.

During test pitting and excavation in December 2020, groundwater seepage was observed at approximately 20 feet below ground surface. In addition, moist soil was encountered immediately above the depth of observed groundwater seepage, which may indicate a capillary fringe and seasonal fluctuations in groundwater levels beneath the Site. Due to institutional, infrastructure and engineering controls, further excavation and sampling activities have been postponed pending access to the north. The excavation and test pit locations were backfilled for safety reasons and a groundwater investigation and remediation workplan will be presented for COGCC review subsequent to additional remediation activities described herein.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**Report Type:** ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Form 27 Supplemental with Investigation and Remediation Workplan Summary

### 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:

Approximately 2,000 cubic yards of soil was transported to the Waste Management Buffalo Ridge Landfill in Keenesburg, CO for disposal.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 2000

E&P waste (solid) description Petroleum Hydrocarbon Impacted Soil \_\_\_\_\_

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

Non-COGCC Disposal Facility: Waste Management Buffalo Ridge Landfill \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 0

E&P waste (liquid) description \_\_\_\_\_

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

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION 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.

Reclamation subsequent to remediation activities will likely consist of backfilling any excavation areas with clean structural fill material on the surface. In addition, following reclamation of land on the outside of the Gas Plant, landscaping and grading will be completed to match pre-excavation conditions.

Is the described reclamation complete? No \_\_\_\_\_

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. 11/17/2019

Actual Spill or Release date, if known. 11/17/2019

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/18/2019

Date of commencement of Site Investigation. 05/13/2020

Date of completion of Site Investigation.

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 12/01/2020

Date of completion of Remediation.

### SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

### OPERATOR COMMENT

DCP is providing this F27S update report as a supplemental to the approved F27 (#402500881) to provide the results of the December 2020 remedial activities which will continue during the first quarter 2021. During the initial test pitting and excavation activities, groundwater seepage into the open excavation was observed. On December 2, 2020 and within the 24-hour notification requirement, the COGCC was notified via telephone and email that groundwater was encountered at a depth where impacted soil above the COGCC standard was confirmed. A copy of the notification email is included as an attachment to this Form 27. Because of the depth of groundwater seepage and soil type, a representative groundwater sample was unable to be collected from the excavation. Based on the soil sample results at the groundwater interface, a groundwater monitoring program will likely be necessary at the Site and details will be provided to COGCC in a supplemental investigation and remediation work plan. Once the point to the south was reached that personnel could no longer dig safely, DCP backfilled and compacted the excavation before focusing on the north. Due to the proximity of the North Platte Canal right of way, DCP is coordinating with the FRICO representatives to get an approved permit application and set a pre-construction meeting prior to completing additional soil investigation/remediation to the north of the gas plant. Contingent on the analytical results for soil samples that may be collected outside of the Gas Plant boundary, a remediation workplan may need to be prepared for FRICO approval prior to performing invasive remediation activities within the right of way.

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

Signed: Chandler Cole

Title: Compliance Coordinator

Submit Date:

Email: COGCCnotification@dcpmidstream.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:

Date:

Remediation Project Number: 14898

### COA Type

### Description

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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

402564792	SITE INVESTIGATION REPORT
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Total Attach: 1 Files

### General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)