

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Candice (Nikki) Graber

## 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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

### 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 #: 15916 Initial Form 27 Document #: 402485947

#### PURPOSE INFORMATION

- ☐ Rule 913.c.(1): Pit or Cuttings Trench closure.
- ☒ Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- ☐ Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- ☐ Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- ☐ Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- ☒ Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- ☐ Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- ☐ Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- ☐ Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- ☐ Rule 913.g: Changes of Operator.
- ☐ Rule 915.b: Request to leave elevated inorganics in situ.
- ☐ Other: \_\_\_\_\_

#### SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>472075</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Plumb 2, 3, 4</u>	Latitude: <u>40.417052</u>	Longitude: <u>-104.586637</u>	
** correct Lat/Long if needed: Latitude: <u>40.417073</u>		Longitude: <u>-104.586793</u>	
QtrQtr: <u>SENE</u>	Sec: <u>7</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 SM Most Sensitive Adjacent Land Use Agriculture

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

A monitoring well is located approximately 696 feet south of the location. An irrigation canal is located approximately 960 feet northwest of the location. An occupied building is located approximately 940 feet east of the location. FWS Wetlands classified as freshwater emergent wetlands are located approximately 861 feet northeast of the location. Livestock is located approximately 1,009 feet northeast of the location. There are no CPW Sensitive Wildlife Habitats identified within a 1/4-mile radius.

## 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	GROUNDWATER	Refer to Figure 1 and Table 2.	Implementation of site investigation plan.
Yes	SOILS	Refer to Figure 1 and Table 1.	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.

On October 13, 2020, a historic release was discovered below the produced water vessel during facility decommissioning activities at the Plumb 2 & 3 tank battery. Following the discovery, excavation activities were initiated and approximately 3,232 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 ):

Between October 9 and October 22, 2020, 57 soil samples (SS01 - SS57) were collected from the sidewalls and base of the excavation at depths ranging between 4 feet and 8 feet below ground surface (bgs). The soil samples were submitted to Summit Scientific Laboratories (Summit) 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 (DRO) by EPA Method 8015. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 910-1 soil standards in the samples collected from the final excavation extent. Soil sample locations and the final excavation extent are illustrated on Figure 1 and the soil analytical results are summarized in Table 1. The laboratory reports are included in Attachment A.

#### Proposed Groundwater Sampling

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

During excavation activities, groundwater was encountered at approximately 4.5 feet bgs. Following the completion of source mass removal activities, one groundwater sample (GW01) was collected from the excavation on October 26, 2020, and submitted to Summit for analysis of BTEX by EPA Method 8260B. Analytical results indicated that benzene and toluene concentrations were above the applicable COGCC Table 910-1 groundwater standards. The groundwater sample location is illustrated on Figure 1 and the groundwater analytical results are summarized in Table 2. The laboratory report is included in Attachment A.

#### 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 ):

Eight monitoring wells will be installed via direct-push drilling methods to delineate the extent of remaining dissolved-phase hydrocarbon impacts. Proposed monitoring well locations are illustrated on Figure 2.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 57

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 11765

### NA / ND

-- Highest concentration of TPH (mg/kg) 3663

NA Highest concentration of SAR

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

### Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

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

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 150

-- Highest concentration of Toluene (µg/l) 720

-- Highest concentration of Ethylbenzene (µg/l) 20

-- Highest concentration of Xylene (µg/l) 290

NA Highest concentration of Methane (mg/l)

### Surface Water

0 Number of surface water samples collected

Number of surface water samples exceeding 915-1

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) 3232

Volume of liquid waste (barrels) 5565

☒ Is further site investigation required?

Eight monitoring wells will be installed within and surrounding the former excavation area to delineate the extent of remaining dissolved-phase hydrocarbon impacts. Proposed monitoring 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.

Between October 9 and October 22, 2019, approximately 3,232 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility for disposal. As previously described, confirmation soil samples collected from the final excavation extent indicated that unsaturated and saturated hydrocarbon impacted material was successfully removed by excavation activities.

## REMEDIAL ACTION 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.

On November 10, 2020, eight (8) monitoring wells (BH01 - BH08) were installed to delineate the lateral extent of dissolved-phase hydrocarbon impacts and establish point of compliance in all cardinal directions of the former excavation extent. Based on analytical results collected from the initial groundwater assessment, monitored natural attenuation (MNA) was selected as the remediation strategy during the fourth quarter 2020 and will continue as the selected remediation strategy through the third quarter 2021.

## Soil Remediation Summary

☐ In Situ

☒ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 3232

\_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Other \_\_\_\_\_

## Groundwater Remediation Summary

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

Yes \_\_\_\_\_ 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 monitoring will continue on a quarterly basis at the eight site monitoring wells (BH01 - BH08). Per the COA issued by COGCC, groundwater samples were submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, 1, 2, 4-trimethylbenzene (TMB), and 1, 3, 5-TMB by EPA Method 8260B. In addition, the up, source, and down-gradient monitoring wells were submitted for analysis of total dissolved solids (TDS) by Method SM 2450C, and sulfate and chloride anions by EPA Method 300.0. Based on the results collected during the second quarter 2021 sampling event, PDC is requesting to continue groundwater monitoring and analysis under the COGCC Table 910-1 analyte suite (BTEX) as it is anticipated the location will be closed in 2021.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☒ Quarterly☐ Semi-Annually☐ Annually☐ Other

#### ☐ Request Alternative Reporting Schedule:

☐ Semi-Annually☐ Annually☐ Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

#### 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 3232

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 5565

E&P waste (liquid) description Impacted groundwater.

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: NGL Energy Disposal Facility

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

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

If YES:

☐ Compliant with Rule 913.h.(1).☐ Compliant with Rule 913.h.(2).☐ Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

Is additional groundwater monitoring to be conducted?

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

# 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 was backfilled and re-graded to match pre-existing conditions. The facility was decommissioned and will be reclaimed in accordance with the 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 provide the seed mix? \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

## SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. \_\_\_\_\_

Proposed date of completion of Reclamation. \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. 10/13/2020

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/21/2020

Proposed site investigation commencement. 10/09/2020

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/09/2020

Proposed date of completion of Remediation. \_\_\_\_\_

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

☐ Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

**OPERATOR COMMENT**

This Supplemental Form 27 was submitted to summarize quarterly groundwater monitoring activities and analytical results collected during the second quarter 2021 at the former Plumb 2 & 3 location. Based on the results of the COGCC Table 915-1 compounds collected during the second quarter 2021 groundwater monitoring event, PDC is requesting to reduce the analyte suite to the COGCC Table 910-1 suite (BTEX) as it is anticipated the location will be closed in 2021.

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: ` 08/12/2021

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: Candice (Nikki) Graber

Date: 08/30/2021

Remediation Project Number: 15916

**Condition of Approval****COA Type****Description**

	In accordance with Rule 915.f, COGCC approves Operators request to comply with the version of Table 910-1 that was previously in effect for Remediation #15916 provided that Remediation is completed by January 15, 2022. If Remediation is not completed by January 15, 2022, then the Operator will comply with the current version of Table 915-1.
1 COA	

**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**

402778715	FORM 27-SUPPLEMENTAL-SUBMITTED
402778748	MONITORING REPORT

Total Attach: 2 Files

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

Environmental	COGCC agrees to the amended sampling plan. Inorganic parameters at this location appear to be in compliance with up gradient and cross gradient samples and Napthalene, 1,2,4-TMB, and 1,3,5-TMB were below Table 915-1.	08/30/2021
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Total: 1 comment(s)