

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402807187

Date Received:

09/17/2021

Spill report taken by:

ALLISON, RICK

Spill/Release Point ID:

480704

## SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

### 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) 597-6847</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Phillip Porter</u>		Mobile: <u>( )</u>
		Email: <u>COGCCSpillRemediati on@pdce.com</u>

☐ Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

### INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 402802389

Initial Report Date: 09/03/2021 Date of Discovery: 09/03/2021 Spill Type: Historical Release

#### Spill/Release Point Location:

QTRQTR SWSW SEC 12 TWP 6n RNG 65W MERIDIAN 6Latitude: 40.495311 Longitude: -104.618468Municipality (if within municipal boundaries): \_\_\_\_\_ County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

#### Reference Location:

Facility Type: WELL SITE☐ Facility/Location ID No \_\_\_\_\_Spill/Release Point Name: VonFelt 13-12☒ Well API No. (Only if the reference facility is well) 05-123-14039☐ No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): UnknownEstimated Condensate Spill Volume(bbl): 0Estimated Flow Back Fluid Spill Volume(bbl): 0Estimated Produced Water Spill Volume(bbl): UnknownEstimated Other E&P Waste Spill Volume(bbl): 0Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: \_\_\_\_\_

Has the subject Spill/Release been controlled at the time of reporting? Yes

#### Land Use:

Current Land Use: CROP LAND

Other(Specify): \_\_\_\_\_

Weather Condition: SunnySurface Owner: FEE

Other(Specify): \_\_\_\_\_

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

PDC discovered a reportable release at the Vonfeldt 13-12 while abandoning the wellhead. Release clean-up and delineation activities are underway. Groundwater is in close proximity to impacted soil.

**List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):**

**OTHER NOTIFICATIONS**

Date	Agency/Party	Contact	Phone	Response
9/3/2021	COGCC	Rick Allison	-	
9/3/2021	Weld Co	NA	-	
9/3/2021	Surface Owner	Private	-	

**REPORT CRITERIA**

**Rule 912.b.(1) Report to the Director (select all criteria that apply):**

- Yes Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.
- Waters of the State: Threatened to Impact \_\_\_\_\_ Public Water System: n/a
- Residence or Occupied Structure: n/a \_\_\_\_\_ Livestock: n/a \_\_\_\_\_
- Wildlife: n/a \_\_\_\_\_ Publicly-Maintained Road: n/a \_\_\_\_\_
- No Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.
- No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.
- No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak
- Enter the approximate time of discovery \_\_\_\_\_ (HH:MM)
- Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 \_\_\_\_\_
- Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? \_\_\_\_\_
- Enter the Document Number of the Initial Accident Report, Form 22 \_\_\_\_\_
- Was there damage during excavation? \_\_\_\_\_
- Was CO 811 notified prior to excavation? \_\_\_\_\_
- No Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.
- Estimated Volume of Impacted Solids (cu. yd.): \_\_\_\_\_
- No Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:
- ☐ The presence of free product or hydrocarbon sheen Surface Water
- ☐ The presence of free product or hydrocarbon sheen on Groundwater
- ☐ The presence of contaminated soil in contact with Groundwater
- ☐ The presence of contaminated soil in contact with Surface water

No	Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylights from the subsurface.
No	Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.
	<input type="checkbox"/> Areas offsite of Oil & Gas Location <input type="checkbox"/> Off-Location Flowline right of way
No	Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.
No	Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

## SPILL/RELEASE DETAIL REPORTS

#1	Supplemental Report Date: 09/10/2021		
<b>FLUIDS</b>	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL			<input checked="" type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER			<input checked="" type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<input type="checkbox"/>
specify: _____			
Was spill/release completely contained within berms or secondary containment? <u>NO</u> Was an Emergency Pit constructed? <u>NO</u>			
<i>Secondary containment, <b>including walls &amp; floor regardless of construction material</b>, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.</i>			
<b>A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit</b>			
Impacted Media (Check all that apply) <input checked="" type="checkbox"/> Soil <input checked="" type="checkbox"/> Groundwater <input type="checkbox"/> Surface Water <input type="checkbox"/> Dry Drainage Feature			
Surface Area Impacted: Length of Impact (feet): <u>16</u>		Width of Impact (feet): <u>23</u>	
Depth of Impact (feet BGS): <u>6</u>		Depth of Impact (inches BGS): _____	
How was extent determined?			
<p>On September 2, 2021, elevated field screened volatile organic compound (VOC) concentrations were discovered at the Von Feldt 13-12 wellhead during decommissioning activities. Approximately 8 cubic yards of impacted material were subsequently removed and transported to the North Weld Waste Management Facility for disposal under a PDC waste manifest. Following excavation activities, one soil sample (WH01) was collected from the base of the excavation, adjacent to the cut and capped and wellhead at approximately 6 feet below ground surface (bgs). During initial sampling activities, the cut and cap crew arrived on site to complete the plug and abandonment of the wellhead. Following P&amp;A activities, confirmation soil sampling was re-initiated in the afternoon and upon arrival to the excavation, groundwater was encountered in the base of the excavation at approximately 6 feet bgs. One groundwater sample (GW01) was immediately collected from the excavation and submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260B. Analytical results indicated that organic compounds are below the applicable COGCC Table 915-1 standards. Based on presence of groundwater, the sample (WH01) which exhibited the highest field screened VOC concentration was submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite. In addition, four soil samples (WH01-[direction]) were collected from the sidewalls of the excavation at approximately 5 feet bgs and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, and TPH (C6-36). Preliminary analytical results indicated that organic compounds were below the applicable COGCC Table 915-1 standards in samples collected from the base and north sidewall of the excavation.</p>			
Soil/Geology Description:			
Otero sandy oam, 1 to 3 percent slopes			
Depth to Groundwater (feet BGS) <u>6</u>		Number Water Wells within 1/2 mile radius: <u>7</u>	
If less than 1 mile, distance in feet to nearest	Water Well <u>506</u> None <input type="checkbox"/>	Surface Water <u>177</u> None <input type="checkbox"/>	
	Wetlands <u>92</u> None <input type="checkbox"/>	Springs _____ None <input checked="" type="checkbox"/>	
	Livestock <u>1019</u> None <input type="checkbox"/>	Occupied Building <u>166</u> None <input type="checkbox"/>	
Additional Spill Details Not Provided Above:			

Three background samples (BKG01) were collected from native material topographically up-gradient of the location at depths ranging between 2.5 feet and 6 feet bgs. The samples were submitted for laboratory analysis of Table 915-1 metals and soil suitability. Preliminary soil analytical results are summarized in Table 1. Groundwater analytical results are summarized in Table 2. GPS coordinates and field screened VOC concentrations for the soil samples collected during excavation and decommissioning activities are summarized in Table 3. Pending receipt of laboratory results, an analyte reduction request will be submitted for the confirmation soil samples collected from the final excavation extent. Final analytical results will be summarized in a forthcoming Supplemental Form 27. A topographic map is attached as Figure 1. The current excavation extent and sample locations are illustrated on Figure 2. Draft laboratory reports are included in Attachment A and the excavation field notes and photo logs are included in Attachment B.

## CORRECTIVE ACTIONS

#1 Supplemental Report Date: 09/10/2021

Root Cause of Spill/Release Unknown (Historical)

Other (specify)

Type of Equipment at Point of Spill/Release: Wellhead Line

If "Other" selected above, specify or describe here:

Describe Incident & Root Cause (include specific equipment and point of failure)

On September 2, 2021, a historic release was discovered adjacent to the former wellhead during wellhead decommissioning activities. Due to the historic nature of the release, a root cause was not identified.

Describe measures taken to prevent the problem(s) from reoccurring:

The wellhead and associated flowline will be removed and will not be replaced.

Volume of Soil Excavated (cubic yards): 8

Disposition of Excavated Soil (attach documentation) ☒ Offsite Disposal ☐ Onsite Treatment  
☐ Other (specify)

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbls): 0

## REQUEST FOR CLOSURE

**Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.**

Basis for Closure: ☐ Corrective Actions Completed (documentation attached, check all that apply)

☐ Horizontal and Vertical extents of impacts have been delineated.

☐ Documentation of compliance with Table 915-1 is attached.

☐ All E&P Waste has been properly treated or disposed.

☒ Work proceeding under an approved Form 27 (Rule 912.c).

Form 27 Remediation Project No: 19634

☐ SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

## OPERATOR COMMENTS:

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

Signed: Print Name: Phillip Porter

Title: Snr. Environmental Rep. Date: 09/17/2021 Email: COGCCSpillRemediation@pdce.com

**COA Type****Description**

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**Attachment List****Att Doc Num****Name**

402807500	TOPOGRAPHIC MAP
402807502	SOIL SAMPLE LOCATION MAP
402807534	PHOTO DOCUMENTATION
402807536	ANALYTICAL RESULTS

Total Attach: 4 Files

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

Environmental	Returning this Form 19 to Draft. Requesting closure because there was no suspected release is not a valid closure request for this Release. While PDC removed 8 yards of material, the release was proximate to groundwater meaning groundwater was threatened by the Release. Therefore, the Release remains reportable and the closure request should be "Work proceeding under approved Form 27".	09/14/2021
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Total: 1 comment(s)