

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

10/12/2021

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>	Phone Numbers
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 #: 18148 Initial Form 27 Document #: 402683219

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: Tank Battery Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>472456</u>	API #: <u></u>	County Name: <u>WELD</u>
Facility Name: <u>Village 31, 32, 41, 42-</u>		Latitude: <u>40.399472</u>	Longitude: <u>-104.889207</u>
		** correct Lat/Long if needed: Latitude: <u>40.399546</u>	Longitude: <u>-104.888888</u>
QtrQtr: <u>NESE</u>	Sec: <u>16</u>	Twp: <u>5N</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 Agriculture

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

None Observed

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	Refer to Tables 1-4 and Figures 1-2	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 July 14, 2021, field screening and confirmation soil sampling was conducted in accordance with the COGCC Rule 911 during the decommissioning and closure of the L-H 1, Edwards 33,43-16U Tank Battery (Figure 1). Based on initial results, it was determined that a historic release was discovered below the former produced water vessel. Following the discovery, mitigation activities were initiated to delineate and remove remaining hydrocarbon impacts. Approximately 578 cubic yards (CY) of impacted material were removed and transported to the North Weld Waste Management Facility for disposal under PDC 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):

On July 14, 2021, one soil sample (SS01) was collected from the source area (adjacent to the produced water vessel) at approximately 5 feet below ground surface (bgs). The sample was submitted to Summit Scientific Laboratories for analysis of the full COGCC Table 915-1 analyte list. Between July 15 and August 13, 2021, two (2) soil samples (SS02-SS03) were collected from the base of the excavation at depths of 20' and 24' bgs, respectively and were submitted for laboratory analysis of benzene, toluene, ethylbenzene, xylenes (BTEX), 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene (N), and total petroleum hydrocarbons (TPH). Preliminary analytical results indicate that contaminants of concern (COCs) include BTEX, 1,2,4-TMB, 1,3,5-TMB, N, 1-methylnaphthalene (M), and 2-M. Analytical results indicated that organic compound concentrations were in exceedance of the applicable COGCC Table 915-1 Protection of Groundwater SSLs in SS01 and SS02.

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):

During initial closure activities conducted on July 14, 2021, soil encountered on-site and below production equipment was visually inspected and field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Per the approved proposed soil sampling plan, samples were collected below and/or adjacent to the above ground storage tank (AST), and the separator flowline and dumphine (SEP-FL & SEP-DL). Samples were submitted for analysis of BTEX, N, 1,2,4-TMB, 1,3,5-TMB and TPH. Analytical results indicated that constituents were in compliance with the applicable COGCC Table 915-1 standards in all laboratory sample locations. Additionally, field screened soil samples were collected adjacent to/below the flare, third party meter house, and on sidewalls of the initial PWV excavation extent sidewalls between ground surface and six feet bgs. Sample locations collected during the initial decommissioning activities are illustrated on Figures 1.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 6
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 1078

NA / ND

-- Highest concentration of TPH (mg/kg) 2680
-- Highest concentration of SAR 0.455
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 24

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 915-1

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 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?

On July 14, 2021, one background soil sample (BKG01) was collected at approximately 2.5 feet bgs from the native material topographically up-gradient of the tank battery and submitted for analysis of the COGCC Table 915-1 metals. Analytical results indicated that arsenic, barium, and selenium were in exceedance of the applicable regulatory standards in native soil. The location of the background sample is detailed on Figure 1.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 578 Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

During initial site investigative activities, deep soil impacts in exceedance of the applicable COGCC Table 915-1 Protection of Groundwater Soil Screening Levels (SSLs) were discovered below 20 feet bgs. Due to the depth of the remaining impacts and buried infrastructure within the vicinity of the excavation, source mass removal activities were discontinued. Supplemental source mass removal activities will continue under a stamped Engineered Excavation Work Plan.

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 July 14, 2021 and August 12, 2021, approximately 578 cubic yards of impacted material were removed from the excavation and transported to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests.

REMEDICATION 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.

Remaining hydrocarbon impacts will be removed via mechanic excavation under a stamped Engineered Excavation Work Plan. Impacted material will be transported off-site to the North Weld Waste Management facility for disposal under PDC waste manifests. Confirmation soil samples will be collected from the base and sidewalls of the final excavation extent and submitted for laboratory analysis of the COGCC approved COC analyte suite (Doc # 402756144). Excavation activities and final analytical results will be summarized in a forthcoming Supplemental Form 27.

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) _____ 578
_____ 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.

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:

Volume of E&P Waste (solid) in cubic yards 578

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: North Weld Waste Management

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

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.

Reclamation will be conducted in accordance with COGCC 1004 Series Rules.

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 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. 01/18/2021

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/31/2021

Proposed site investigation commencement. 07/14/2021

Proposed completion of site investigation. 03/31/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2021

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

Supplemental source mass removal activities will resume under the stamped Engineered Excavation Work Plan beginning November 1, 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: ` 10/12/2021 _____

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: 10/20/2021 _____

Remediation Project Number: 18148 _____

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

	Operator shall provide the stamped Engineered Excavation Work Plan with the next Supplemental Form 27.
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**

402834473	FORM 27-SUPPLEMENTAL-SUBMITTED
402837520	ANALYTICAL RESULTS
402837522	SOIL SAMPLE LOCATION MAP
402837523	PHOTO DOCUMENTATION

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)