

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.

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: _____

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>472456</u>	API #: _____	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):

Between November 5, and November 15, 2021, approximately 2,941 cubic yards of hydrocarbon impacted material were removed from site and transported to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests. Forty-six soil samples (SS04 - SS49) were collected from the base and sidewalls of the final excavation extent at depths ranging from 8 feet to 35 feet below ground surface (bgs). Samples were submitted for laboratory analysis of the COGCC approved contaminants of concern (COCs). Additionally, one sample (SS50) was collected at approximately 2.5 feet bgs and submitted for analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), and boron.

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 dumpline (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 Figure 1.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 47

Number of soil samples exceeding 915-1 0

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

Approximate areal extent (square feet) 5026

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 1

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 915-1 1

Surface Water

0 Number of surface water samples collected

Number of surface water samples exceeding 915-1 1

If surface water is impacted, other agency notification may be required.

NA / ND

ND Highest concentration of TPH (mg/kg) 1

-- Highest concentration of SAR 0.275

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 35

Highest concentration of Benzene (µg/l) 1

Highest concentration of Toluene (µg/l) 1

Highest concentration of Ethylbenzene (µg/l) 1

Highest concentration of Xylene (µg/l) 1

Highest concentration of Methane (mg/l) 1

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) 3519

Volume of liquid waste (barrels) 0

☐ Is further site investigation required?**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.

Following the discovery of a historic hydrocarbon release, mitigation efforts were initiated and approximately 578 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility for disposal under PDC manifests. Based on the depth of impacts, source mass removal activities were suspended and an Engineered Excavation Work Plan was drafted. Following the approval of the Engineered Excavation Work Plan, source mass removal activities were re-initiated and between November 5, and November 15, 2021, approximately 2,941 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.

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.

Between November 5, and November 15, 2021, forty-seven confirmation soil samples were 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). Analytical results received during source mass removal activities indicated that all constituent concentrations were in compliance with the applicable COGCC Table 915-1 regulatory standards in all soil samples collected from the final excavation extent. The final excavation extent and sample locations are illustrated on are illustrated on Figures 2. Soil analytical results and field screened VOC readings are summarized in Tables 1 through 5. The laboratory reports are included in Attachment A. The field notes and photo documentation are included as Attachment B.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 3519
_____ 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.

Groundwater was not encountered during source mass removal activities.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly

☐ Semi-Annually

☐ Annually

☒ Other

No Further Action (NFA) Request

☐ **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 No Further Action (NFA) Request

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 3519

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? No

Does Groundwater meet Table 915-1 standards? Yes

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.

Following decommissioning and excavation activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with the COGCC 1000 series.

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. 07/15/2021

Proposed date of completion of Reclamation. 11/18/2022

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. 07/14/2021

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. 11/18/2021

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

Based on the analytical results collected from the final excavation extent, PDC is requesting a no further action (NFA) designation for the L-H #1, Edwards 16U tank battery location.

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:

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:

Date:

Remediation Project Number: 18148

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**

402932253	REMEDIAL ACTION PLAN
402932263	PHOTO DOCUMENTATION
402932271	SOIL SAMPLE LOCATION MAP
402945119	ANALYTICAL RESULTS
402945122	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)