

# State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



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Report taken by:

RICK ALLISON

## 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 #: 19818 Initial Form 27 Document #: 402795431

#### 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>311355</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>LOLOFF-65N64W 35NENE</u>		Latitude: <u>40.361326</u>	Longitude: <u>-104.514483</u>
		** correct Lat/Long if needed: Latitude: <u>40.362858</u>	Longitude: <u>-104.507697</u>
QtrQtr: <u>NENE</u>	Sec: <u>35</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 Wetlands / 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**

Nearest Well: Irrigation - 952 feet NW, Surface Water: Freshwater Pond - 275 feet SE, Livestock: 0 feet (appears to be located within pastureland), FWS  
Wetlands: Freshwater Emergent Wetland (PEM1C) - 125 feet SW

# 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 Table 5 & Figures 1 & 2	Confirmation Groundwater Sampling
Yes	SOILS	Refer to Tables 1-4 & 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 October 15, 2021, field screening and confirmation soil sampling was conducted in accordance with the COGCC Rule 911 during the decommissioning and closure of the Loloff 35-5 Tank Battery (Figure 1). Based on initial results, it was determined that a historic release was discovered below the former separator. During excavation activities, groundwater was encountered at approximately 3 feet below ground surface (bgs). Approximately 980 cubic yards (CY) of impacted material were removed and transported to the North Weld Waste Management Facility for disposal under PDC manifests. Additionally, groundwater vacuum recovery was conducted concurrent with excavation activities and approximately 220 barrels (bbls) of groundwater were removed from the excavation and transported to NGL C6 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 ):

On October 14, 2021, one soil sample (SS01) was collected from the source area at approximately 3 feet bgs and submitted to Summit Scientific Laboratories for analysis of the full COGCC Table 915-1 analyte list. Preliminary analytical results indicate that the COCs include BTEX, 1,2,4-TMB, 1,3,5-TMB, naphthalene (N), TPH, anthracene, chrysene, fluorene, and 1-methylnaphtalene. Between October 15 and December 3, 2021, sixty-one (61) soil samples (SS02-SS62) were collected from the sidewalls and base of the excavation at depths ranging from 2.5 to 5 feet bgs and were submitted for laboratory analysis of the above referenced COCs. Additionally, soil sample SS51 was submitted for additional analysis of pH, EC, SAR, & boron. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 915-1 Protection of Groundwater SSLs in the samples collected from the final excavation extent. Soil sample SS51 exceeded the applicable regulatory standard for SAR.

### Proposed Groundwater Sampling

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

On October 15, 2021, one groundwater sample (GW01) was collected from the tank battery excavation and was submitted for laboratory analysis of BTEX, N, 1,2,4-TMB, and 1,3,5-TMB. Analytical results indicated that organic compound concentrations were in exceedance of the COGCC Table 915-1 standards in sample GW01. The groundwater sample location is illustrated on Figure 1 and the analytical results are summarized on Table 5.

### 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 October 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). Field screening locations are illustrated on Figure 1.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 65  
Number of soil samples exceeding 915-1 6  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 2100

### NA / ND

-- Highest concentration of TPH (mg/kg) 1062  
-- Highest concentration of SAR 13.5  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 5

### Groundwater

Number of groundwater samples collected 1  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 3'  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 220  
ND Highest concentration of Toluene (µg/l)   
-- Highest concentration of Ethylbenzene (µg/l) 10  
ND Highest concentration of Xylene (µg/l)   
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?

On October 26, 2021, three background soil samples (BKG01) were collected at approximately 2.5 feet, 4 feet, and 6 feet bgs, respectively, from native material topographically up-gradient of the tank battery and submitted for analysis of COGCC Table 915-1 metals. Analytical results indicated that arsenic and selenium were in exceedance of the applicable regulatory standards in native soil.

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

Volume of solid waste (cubic yards) 980 Volume of liquid waste (barrels) 220

☒ Is further site investigation required?

Sixteen (16) groundwater monitoring wells will be installed to delineate dissolved-phase hydrocarbon impacts within and surrounding the former tank battery excavation extent. Volatile organic compound (VOC) concentrations using a photoionization detector (PID) and lithologic descriptions will be recorded for each borehole. One soil sample will be collected from the water table interface; additionally, if elevated VOC concentrations are encountered during the investigation, a second sample will be collected from the interval exhibiting the highest VOC concentration from the borehole and submitted for laboratory analysis of the COGCC approved COCs. Additionally, a third soil sample will be collected from approximately 2.5 feet bgs from each borehole to evaluate soil suitability for reclamation. Proposed monitoring well locations are illustrated on Figure 3.

Two (2) additional background soil borings will be advanced to approximately 5 feet bgs via hand auger drilling methods. The background soil borings will be advanced adjacent to the former excavation extent to evaluate soil suitability for reclamation in native material. Confirmation sampling will be completed by the end of the second quarter 2022. The proposed background soil boring locations are illustrated on Figure 4.

One soil sample (AST01) was collected for field screening during initial decommissioning activities. One groundwater monitoring well will be installed in the vicinity of the AST01 sample location. Soil samples will be collected from the borehole as detailed above to complete decommissioning soil sampling activities.

## 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 15 and December 3, 2021, approximately 980 cubic yards of impacted material were excavated adjacent to the separator and transported to the North Weld Waste Management Facility for disposal under PDC waste manifests.

Groundwater vacuum recovery activities were conducted concurrent with excavation activities. Approximately 220 barrels of groundwater were recovered and transported to the NGL C6 facility 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.

A remediation strategy will be selected following the evaluation of soil and groundwater analytical results.

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) \_\_\_\_\_ 980

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.

Based on the analytical data collected during source mass removal activities, PDC will conduct quarterly groundwater monitoring at the seventeen proposed monitoring wells until closure criteria are met. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5 -TMB by EPA Method 8260B, as well as total dissolved solids (TDS), chlorides, and sulfates in accordance with Table 915-1.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☒ Other

Confirmation Sample Summary, Analyte Reduction Request,  
Supplemental Site Investigation Proposal

#### ☐ 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 Confirmation Sample Summary, Analyte Reduction Request,  
Supplemental Site Investigation Proposal

### 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 980

E&P waste (solid) description Hydrocarbon impacted soil

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

Non-COGCC Disposal Facility: North Weld Waste Management

Volume of E&P Waste (liquid) in barrels 220

E&P waste (liquid) description Hydrocarbon impacted groundwater

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

Non-COGCC Disposal Facility: NGL C6

## 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.

Following tank battery decommissioning 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. 10/14/2021

Proposed date of completion of Reclamation. 03/01/2027

## 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. 06/24/2021

Actual Spill or Release date, or date of discovery. 10/15/2021

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/20/2021

Proposed site investigation commencement. 09/20/2021

Proposed completion of site investigation. 06/30/2023

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/15/2021

Proposed date of completion of Remediation. 03/01/2027

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 analytical results for the waste characterization sample SS01 collected from the tank battery source area, PDC is requesting that the COCs for the historic release discovered at the Loloff 35-5 Tank Battery be reduced to the following: BTEX, 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, anthracene, chrysene, fluorene, 1-methylnaphthalene and SAR.

Following the approval of this form, PDC will install and conduct quarterly groundwater monitoring at the seventeen proposed monitoring wells until closure criteria are met. Up to three soil samples will be collected from each borehole. Additionally, PDC will conduct a supplemental site investigation to evaluate soil suitability for reclamation in native material adjacent to the tank battery.

Additional activities will be conducted in accordance with the United States Fish and Wildlife Service as the excavation extent is directly adjacent to a freshwater emergent wetland (PEM1C).

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: 03/02/2022

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: RICK ALLISON

Date: 03/18/2022

Remediation Project Number: 19818

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

0 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**

402932798	FORM 27-SUPPLEMENTAL-SUBMITTED
402949770	SOIL SAMPLE LOCATION MAP
402949772	SOIL SAMPLE LOCATION MAP
402949774	SITE INVESTIGATION PLAN
402949775	ANALYTICAL RESULTS
402949777	PHOTO DOCUMENTATION
402968794	SITE INVESTIGATION PLAN

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)