

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
403068933
Receive Date:
06/28/2022
Report taken by:
Jason Kosola

Site Investigation and Remediation Workplan (Initial 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 Phone: <u>(303) 580-8600</u> Mobile: <u>()</u>
Address: <u>1775 SHERMAN STREET - STE 3000</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>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 24464 Initial Form 27 Document #: 403068933

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>SPILL OR RELEASE</u>	Facility ID: <u>481934</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Fagerberg 11C-7M</u>	Latitude: <u>40.502490</u>	Longitude: <u>-104.733780</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>12</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agricultural
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 - 1,801' E; Occupied Building: 1,285' N; Surface water: Irrigation ditch - 145' N; FWS Wetlands: 730' ENE

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, Figure 1	Confirmation Groundwater Samples
Yes	SOILS	Refer to Tables 1-4, Figure 1	Confirmation Soil Samples

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 April 6, 2022, a release was discovered at the Fagerberg Pad. Approximately 2 barrels of produced water were released from a nipple pin hole leak at the Fagerberg Pad. The majority of the release occurred inside secondary containment; however, due to high winds oil and produced water misted outside of secondary containment. Following the discovery, mitigation activities were immediately initiated and to date, approximately 40 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. During excavation activities, groundwater was encountered at approximately 7 feet below ground surface (bgs).

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 April 7, 2022, one soil sample (SS01) was collected from the impacted source material area beneath the separator at approximately 6 inches bgs, and submitted for analysis of the full COGCC Table 915-1 analytical suite. Analytical results indicate that the COCs include BTEX, 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, benzantracene, chrysene, fluoranthene, pyrene, 1-M, 2-M, EC, SAR, and boron. Between April 7 and 18, 2022, twenty-eight soil samples (SS02-SS20, SS23-SS31) were collected from the release extent as well as sidewalls and base of the excavation, at depths ranging from 6 inches to 7 feet bgs and were submitted for laboratory analysis of the above referenced COCs. Additionally, soil sample (SS21) was submitted for laboratory analysis of pH, EC, SAR & boron. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 915-1 standards in the samples collected from the release extent and final excavation extent.

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 7 feet bgs. One groundwater sample (GW01) was collected from the excavation and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB. Analytical results indicate that organic compound concentrations were in exceedance of the COGCC Table 915-1 standards in sample GW01.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 30

Number of soil samples exceeding 915-1 6

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

Approximate areal extent (square feet) 2250

NA / ND

-- Highest concentration of TPH (mg/kg) 6800

-- Highest concentration of SAR 41.4

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 7

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 120

-- Highest concentration of Toluene (µg/l) 690

-- Highest concentration of Ethylbenzene (µg/l) 84

-- Highest concentration of Xylene (µg/l) 700

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 April 14, 2022, three background soil samples (BKG01) were collected at approximately 2 foot, 2.5 feet, and 4 feet, respectively, from native material topographically up-gradient of the tank battery and submitted for analysis of the COGCC Table 915-1 metals and soil suitability for reclamation. Preliminary analytical results indicated that arsenic, barium, cadmium, 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) 40

Volume of liquid waste (barrels) 0

Is further site investigation required?

Seven (7) groundwater monitoring wells will be installed to delineate dissolved-phase hydrocarbon impacts surrounding the tank battery excavation extent and secondary containment. Following the release, the tank battery was re-built and remains operational. Volatile organic compound (VOC) concentrations using a photoionization detector (PID) and lithologic descriptions will be recorded for each borehole. If elevated VOC concentrations are encountered during the investigation, a 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. Proposed monitoring well locations are illustrated on Figure 2.

Additionally, up to six (6) background soil borings will be advanced in native material adjacent to the tank battery to assess soil suitability for reclamation in native material. Volatile organic compound (VOC) concentrations using a photoionization detector (PID) and lithologic descriptions will be recorded for each borehole. Soil samples will be collected from each soil boring between 0-6 inches bgs and submitted for laboratory analysis of electrical conductivity (EC). The proposed soil boring locations are illustrated on Figure 3.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Between April 7 and 15, 2021, approximately 40 CY of impacted material were removed from the tank battery. All impacted material was transported to the North Weld Waste Management Facility 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.

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)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 40

_____ 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

_____ 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 seven 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

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 Release response, confirmation sampling, analyte reduction request, supp. site inv. proposal

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Operator does not have site-specific financial assurance for this project; however, Operator has inactive well, blanket, and surface bonding including Surety IDs 106077122, 106473808, and 106473820, as well as commercial general liability and/or umbrella/excess insurance meeting the requirements of Rule 705.b. Operator does not anticipate making an insurance claim for this project.

- Investigation and delineation has been completed for organics in soil. Native material assessment of soil sustainability for reclamation is ongoing.
- Source mass removal has been completed.
- Monitoring wells will be installed, and groundwater will be monitored for natural attenuation.

Costs included herein are estimates only and may change over time based on numerous factors. Accordingly, Operator makes no guarantees as to the accuracy of such cost estimates, thus providing an estimate for the next year below.

Operator anticipates the remaining cost for this project to be: \$ 40000

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 40

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: _____

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 Fagerberg Pad is an active facility and there are no current plans for decommissioning or reclamation activities. This stated, following excavation activities, the location was backfilled, compacted, and re-contoured for tank battery operations to continue.

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. _____

Actual Spill or Release date, or date of discovery. 04/06/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/06/2022

Proposed site investigation commencement. 07/01/2022

Proposed completion of site investigation. 09/30/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/06/2022

Proposed date of completion of Remediation. 06/27/2027

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, PDC is requesting that the COCs for the release discovered at the Fagerberg Pad be reduced to the following: BTEX, 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, benzantracene, chrysene, fluoranthene, pyrene, 1-M, 2-M, EC, SAR, and boron.

Following the approval of this form, PDC will install and conduct quarterly groundwater monitoring at the seven proposed monitoring wells until closure criteria are met. Up to six soil borings will be advanced in native material in order to evaluate soil suitability for reclamation in native material. In addition, a Supplemental Form 19 will be prepared and submitted to close Spill Number 481934.

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: 06/28/2022

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: Jason Kosola

Date: 08/08/2022

Remediation Project Number: 24464

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

	Reduced analyte request is approved.
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**

403068933	FORM 27-INITIAL-SUBMITTED
403071667	SOIL SAMPLE LOCATION MAP
403071669	SITE INVESTIGATION PLAN
403071672	SITE INVESTIGATION PLAN
403071676	ANALYTICAL RESULTS
403071678	PHOTO DOCUMENTATION

Total Attach: 6 Files

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

Environmental	Changed facility type from "location" to Spill 481934. This remediation is for clean up of Spill 481934	07/12/2022
---------------	---	------------

Total: 1 comment(s)