

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

08/29/2022

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> | Phone Numbers Phone: <u>(303) 860-5800</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 #: 18518 Initial Form 27 Document #: 402709269

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>WELL</u> | Facility ID: _____ | API #: <u>123-36107</u> | County Name: <u>WELD</u> |
| Facility Name: <u>Booth 7-26</u> | | Latitude: <u>40.551485</u> | Longitude: <u>-104.628950</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>NWNE</u> | Sec: <u>26</u> | Twp: <u>7N</u> | Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agriculture / Riparian

Is domestic water well within 1/4 mile? No 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

Surface Water: Riverine and Saxton Lake - 340 feet NE, Occupied Building - 1,130 feet NW, Livestock - 1,065 feet E and N, FWS Wetlands, Unnamed Riverine - 340 feet NE with Saxton Lake located beyond Riverine, HPH: Rule 309.e.1 - Located within Bald Eagle Roost Site

Wellhead & Flowline conflict as wellhead & battery falls within Bald Eagle Roost Site as well as close proximity to adjacent riverine and lake habitat (Saxton Lake)

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 | See Tables 1-5 and Figures 1 and 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.

In accordance with COGCC Rule 911, this form serves as notification for the abandonment of the Booth 7-26 wellhead and in-place abandonment of the off-location flowline. The ground and sub-surfaces will be visually inspected for hydrocarbon impacts during equipment decommissioning. Field observations and photo documentation will be recorded in a field inspection form for submittal to the COGCC.

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):

Soil samples will be collected below and/or adjacent to applicable facility equipment, as defined in the Rule 911.a.(4) guidance document (1/4/21), for field screening purposes. Discrete soil samples will be collected for laboratory analysis either in any area of observed hydrocarbon impacts, or in the sample locations designated by the COGCC. GPS data will be collected for all soil sample locations. Soil samples will be submitted for laboratory for analysis of BTEX, naphthalene, total petroleum hydrocarbons (TPH C6-C36), 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Methods 8260B and 8015. Additionally, soil sample(s) will be collected in the area most likely to be impacted by produced water to confirm soil suitability for reclamation. The sample (s) will be submitted for laboratory analysis of electrical conductivity (EC), pH, sodium adsorption ratio (SAR), and boron by saturated paste and hot water soluble extraction methods. Refer to the Proposed Sample Location Map.

Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

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):

An assessment will be conducted during the removal of this off-location flowline (estimated to be 525 feet in length), with an emphasis in the areas where the flowline is in close proximity to sensitive areas, such as drainage/surface water crossings, High Priority Habitats, and FWS wetlands. The flowline and adjacent sub-surface will be inspected for any visual and olfactory indicators of potential failure and hydrocarbon impacts. Soils will be field screened below the flowline and if suspected impacts are observed, a soil sample will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, and TPH (C6-C36) by EPA Methods 8260B and 8015. GPS data and photo documentation will be recorded for each inspection/sample location. A sample location figure will be provided in the Supplemental Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 100

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

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.

NA / ND

ND Highest concentration of TPH (mg/kg)
-- Highest concentration of SAR 0.868
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 7

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)

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

On June 30, 2021, one background sample (BKG01) was collected from native material topographically up-gradient of the wellhead location and submitted for analysis of pH. Analytical results indicated that pH was in exceedance with the applicable Table 915-1 standard in native material.

Additionally, On June 2, 2022, ten (10) background soil samples (BKG02-BKG06) were collected at approximately 3-4 feet, and 7-8 feet bgs from native material topographically up-gradient of the wellhead. All background soil samples were submitted for analysis of COGCC Table 915-1 metals. Analytical results indicated that arsenic, barium, and selenium were in exceedance of the applicable regulatory standards in native soil. Based on these results, arsenic and selenium exceedances observed in soil samples collected from soil borings SB01 through SB04 are within 1.25x the background concentrations and indicative of native soil conditions, as referenced in footnote 11 of the Table 915-1.

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

Volume of solid waste (cubic yards) 8 Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Five (5) additional background soil borings will be advanced to evaluate barium levels in native soils. Soil samples will be collected from the background soil borings at 3-4 feet and 7-8 feet bgs. The soil samples will be submitted for laboratory analysis of barium. The proposed soil boring locations are illustrated on figure 2. Confirmation sampling is expected to be conducted during the first quarter of 2023.

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.

During wellhead decommissioning activities conducted on June 30, 2021, elevated field screened VOC concentrations were recorded below the former flowline riser location. Consequently, approximately 8 cubic yards of soil were removed from below and adjacent to the former flowline riser and transported to the North Weld Waste Management Landfill for disposal under a PDC waste manifest.

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.

Based upon the COA issued by the COGCC (Document # 402817834) on October 28, 2021, a supplemental site investigation was conducted on June 2, 2022, at the former Booth 7-26 wellhead location. Ten soil borings (SB01-SB05 and BKG02-BKG06) were advanced via hand auger to confirm absence of hydrocarbon impacts beneath and adjacent to the former flowline riser and evaluate Table 915-1 metals in native soils. One soil sample was collected from soil boring SB01 between 7 and 8 feet bgs, from soil adjacent to FLR01-B. Additionally, one soil sample was collected from each of the surrounding soil borings SB02-SB05 between 3 and 4 feet bgs. All five soil samples (SB01-SB05) were submitted for laboratory analysis of the full Table 915-1 analytical suite. Analytical results indicated that all organic and inorganic constituents were in compliance with the applicable COGCC Protection of Groundwater SSLs for all soil samples with the exception to arsenic, barium, and selenium. Consequently, ten background soil samples (BKG02-BKG06) were collected between 3 feet and 8 feet bgs, and submitted for analysis of Table 915-1 metals. Analytical results indicated that arsenic, barium, and selenium were in exceedance of the applicable regulatory standards in native soil. Based on these results, arsenic and selenium exceedances observed in soil samples collected from soil borings SB01 through SB05 are within 1.25x the background concentrations and indicative of native soil conditions. Analytical results are summarized in Tables 1 through 4, and GPS coordinates and field screened VOC concentrations are summarized in Table 5. The soil boring locations are illustrated on Figure 1. The laboratory reports are included as Attachment A and the soil boring logs are included as Attachment B.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 8

_____ 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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☒ Other

Confirmation Sampling Summary and 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 Sampling Summary and Supplemental Site Investigation 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.

- Facility and infrastructure were decommissioned, and the location will be reclaimed in accordance with the COGCC 1000 Series.
- Further soil investigation is required for Table 915-1 metals at the former wellhead.

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: \$ 10000

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 8

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: North Weld Landfill

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? No

Does the previous reply indicate consideration of background concentrations? _____

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 wellhead and flowline abandonment activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with 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. 06/30/2021

Proposed date of completion of Reclamation. 06/30/2022

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. 01/04/2021

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/28/2021

Proposed site investigation commencement. 01/01/2023

Proposed completion of site investigation. 03/31/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/30/2021

Proposed date of completion of Remediation. 03/31/2023

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 COA issued by the COGCC (Document # 402817834) on October 28, 2022, a supplemental site investigation conducted on June 2, 2022, at the former Booth 7-26 Wellhead. Analytical results for the soil samples collected from soil borings SB01 through SB05 indicated that all organic and inorganic constituents were in compliance with the applicable COGCC Protection of Groundwater SSLs for all soil samples with the exception to arsenic, barium, and selenium. Background soil sample analytical results indicated that arsenic, barium, and selenium were in exceedance of the applicable regulatory standards in native soil. Based on these results, arsenic and selenium exceedances observed in soil samples collected from soil borings SB01 through SB05 are within 1.25x the background concentrations and indicative of native soil conditions as referenced in footnote 11 of the Table 915-1.

Based on the results described herein for the Booth 7-26 wellhead, PDC will conduct a supplemental site investigation to evaluate barium in native soils. This site investigation will be conducted by the end of the first quarter 2023.

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: 08/29/2022

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: 11/30/2022

Remediation Project Number: 18518

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

| | |
|-----------|--------------------------------|
| 403130288 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403130678 | LOGS |
| 403130680 | SOIL SAMPLE LOCATION MAP |
| 403130795 | ANALYTICAL RESULTS |

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)