

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

08/29/2022

Report taken by:

Kari Brown

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 #: 18608 Initial Form 27 Document #: 402704519

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>330777</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>BUFFALO GARDENS-62N68W</u>		Latitude: <u>40.144467</u>	Longitude: <u>-104.944005</u>
<u>13NENE</u>			
** correct Lat/Long if needed: Latitude: <u>40.144297</u>		Longitude: <u>-104.944442</u>	
QtrQtr: <u>NENE</u>	Sec: <u>13</u>	Twp: <u>2N</u>	Range: <u>68W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Residential / 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: Domestic 105 feet S, Nearest Surface Water: Irrigation Ditch 452 feet SW, Occupied Buildings: 373 feet N, Livestock: 366 feet S, FWS Wetlands - Riverine, Irrigation Ditch 452 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	SOILS	Refer to Tables 1-4 & Figures 1	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 September 7, 2021, field screening and confirmation soil sampling was conducted in accordance with the COGCC Rule 911 during the decommissioning and closure of the Buffalo Gardens 41-13 Tank Battery (Figure 1). Based on initial results, it was determined that a historic release was discovered beneath the former separator dump line. Following the discovery, mitigation activities were initiated to delineate and remove remaining hydrocarbon impacts. Between September 7 and 13, 2021, Approximately 129 cubic yards (CY) of impacted material were removed and transported to the Front Range Regional Landfill for disposal under PDC manifests. Upon arrival to the location on Monday, September 13, 2021, stormwater was observed in the excavation. Before continued excavation activities resumed, approximately 3 barrels of stormwater were removed from the excavation and transported to the NGL C6 facility for disposal under a PDC waste manifest. Following stormwater removal, the excavation was monitored to confirm the absence of groundwater. Additionally, a domestic well (Permit No. 32335), located approximately 30 feet northeast of the separator exhibits a static water level of 24 feet bgs. Based on the absence of groundwater recorded during excavation activities, the local static groundwater level, and the precipitation event that was observed on September 12, 2021, water observed within the base of the excavation was confirmed to be stormwater and not indicative of static groundwater levels.

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 September 8, 2021, one soil sample (SS01) was collected from the source area at approximately 2.5 feet below ground surface (bgs) and submitted to Summit Scientific Laboratories for analysis of the full COGCC Table 915-1 analyte list. Preliminary analytical results indicate that contaminants of concern (COCs) include BTEX, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene (N), TPH, acenaphthene, benz(a)anthracene, chrysene, fluoranthene, fluorene, pyrene, 1-methylnaphthalene (M), 2-M, and barium. Between September 9 and 13, 2021, eleven (11) soil samples (SS02-SS10 & SS12-SS13) were collected from the sidewalls and base of the excavation at depths ranging from 6 to 15 feet bgs and were submitted for laboratory analysis of the above referenced COCs. In addition, two samples (SS11 & SS14) were collected at 2.5 feet bgs and submitted for Table 915 soil suitability constituents.

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 September 7, 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), produced water vessel (PWV), and separator flowline (SEP-FL). Samples were submitted for analysis of BTEX, N, 1,2,4-TMB, 1,3,5-TMB, and TPH (C6-C36). In addition, the samples collected below and adjacent to the AST and PWV were submitted for laboratory analysis of pH, EC, SAR, and boron. Analytical results indicated that constituents were in compliance with the applicable COGCC Table 915-1 standards in all laboratory sample locations. Analytical results are summarized in Tables 1-4. GPS coordinates and field screened VOC concentrations are summarized in Table 5.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 22

Number of soil samples exceeding 915-1 7

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 315

NA / ND

-- Highest concentration of TPH (mg/kg) 2460

-- Highest concentration of SAR 0.039

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 15

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 September 10, 2021, three background soil samples (BKG02) was collected at approximately 2.5 feet, 6 feet, & 15 feet bgs, respectively, from native material topographically up-gradient of the tank battery & submitted for analysis of pH, EC, SAR, boron & the COGCC Table 915-1 metals. Analytical results indicated that pH, arsenic, & selenium were in exceedance of the applicable regulatory standards in native soil.

Additionally, on June 2, 2022, nine background soil samples (BKG03-BKG05) were collected at approximately 2.5 foot, 6 feet, & the soil boring terminus from native material & submitted for analysis of Table 915-1 metals. Analytical results indicated that arsenic, barium, & selenium were in exceedance of the applicable standards in native soil. Based on these results, the barium exceedances observed in soil samples SS03, SS04, & SS08 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) 129

Volume of liquid waste (barrels) 3

☒ Is further site investigation required?

Three (3) additional background soil borings will be advanced to approximately 15 feet bgs via hand auger drilling methods. The background soil borings will be advanced adjacent to the former excavation extent to evaluate Table 915-1 metal concentrations in native material. Confirmation sampling will be completed by the end of the first quarter 2022.

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 September 7 and 13, 2021, approximately 129 cubic yards of impacted material were excavated adjacent to the separator dump line and transported to the Front Range Regional Landfill for disposal under PDC waste manifests. Approximately 3 barrels of stormwater were removed from the excavation and transported to the NGL C6 facility 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.

On June 2, 2022, three background soil borings (BKG03 through BKG05) were advanced adjacent to the tank battery via hand auger to evaluate COGCC Table 915-1 metal concentrations in native material. Lithologic descriptions and field screened volatile organic compound (VOC) concentrations were collected using a photoionization detector (PID) in 1 foot intervals. Three soil samples were collected from each respective background soil boring at 2.5 feet, 6 feet, and at the terminus of the soil boring. All soil samples were submitted for laboratory analysis of COGCC Table 915-1 metals. Analytical results indicated that barium was in exceedance of the applicable COGCC Table 915-1 Protection of Groundwater SSLs in native material. Based on the results, barium concentrations observed in confirmation soil samples collected from the final excavation extent are in compliance with the COGCC Table 915-1 Protection of Groundwater SSLs or representative of native soil conditions. Soil analytical results are summarized in Tables 1 through 4, and GPS coordinates and field screened VOC concentrations are summarized in Table 5. The background 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) _____ 129

_____ 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.

Groundwater was not encountered during excavation activities.

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

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.

- The project has been completed and no further assessment or remediation is required at this time.

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: \$

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation?

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

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

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

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?

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? Yes

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 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. 09/07/2024

Proposed date of completion of Reclamation. 09/07/2026

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. 09/07/2021

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 09/07/2021

Proposed completion of site investigation. 06/02/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/07/2021

Proposed date of completion of Remediation. 06/02/2022

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 site investigation activities were conducted at the Buffalo Gardens 41-13 tank battery on June 2, 2022. Nine (9) background soil samples (BKG03-BKG05) were collected at approximately 2.5 foot, 6 feet, and the soil boring terminus from native material and submitted for analysis of Table 915-1 metals. Analytical results indicated that arsenic, barium, & selenium were in exceedance of the applicable standards in native soil. Based on these results, the barium exceedances observed in soil samples SS03, SS04, & SS08 are within 1.25x the background concentrations and indicative of native soil conditions, as referenced in footnote 11 of the Table 915-1. Additionally, on September 10, 2021, three (3) background soil samples (BKG02) were collected at approximately 2.5 feet, 6 feet, and 15 feet bgs from native material topographically up-gradient of the tank battery and submitted for analysis of pH. Analytical results indicated that pH was in exceedance of the applicable regulatory standards in native soil. Based on these results, the pH exceedance observed in soil sample SS11 is indicative of native soil conditions.

Based on the information described herein, PDC is submitting a No Further Action (NFA) request for the Buffalo Gardens 41-13 tank battery.

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: Kari Brown

Date: 12/02/2022

Remediation Project Number: 18608

COA Type

Description

	<p>Based on the information presented, it appears that no further remedial action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>
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

403107313	FORM 27-SUPPLEMENTAL-SUBMITTED
403108817	LOGS
403108818	SOIL SAMPLE LOCATION MAP
403108846	ANALYTICAL RESULTS

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)