

State of Colorado  
Energy & Carbon Management Commission

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Document Number:

403535753

Date Received:

09/21/2023

Spill report taken by:

Anderson, Laurel

Spill/Release Point ID:

485126

## SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

### OPERATOR INFORMATION

Name of Operator: PDC ENERGY INC	Operator No: 69175	<b>Phone Numbers</b>
Address: 1099 18TH STREET SUITE 1500		Phone: (303) 597-6847
City: DENVER State: CO Zip: 80202		Mobile: ( )
Contact Person: Phillip Porter		Email: taspillremediationcontractor@pdce.com

☐ Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

### INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 403519326

Initial Report Date: 09/02/2023 Date of Discovery: 08/30/2023 Spill Type: Historical Release

#### Spill/Release Point Location:

QTRQTR NWSW SEC 25 TWP 1N RNG 67W MERIDIAN 6

Latitude: 40.018607 Longitude: -104.843987

Municipality (if within municipal boundaries): County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

#### Reference Location:

Facility Type: OFF-LOCATION FLOWLINE

☒ Facility/Location ID No 327357

Spill/Release Point Name: Briggs Aggregate 1-25 - Sales Line

☐ Well API No. (Only if the reference facility is well) 05- -

☐ No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): 0

Estimated Condensate Spill Volume(bbl): Unknown

Estimated Flow Back Fluid Spill Volume(bbl): 0

Estimated Produced Water Spill Volume(bbl): 0

Estimated Other E&P Waste Spill Volume(bbl): 0

Estimated Drilling Fluid Spill Volume(bbl): 0

Specify:

Has the subject Spill/Release been controlled at the time of reporting? Yes

#### Land Use:

Current Land Use: CROP LAND

Other(Specify):

Weather Condition: 90 F and sunny

Surface Owner: FEE

Other(Specify):

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

An historic release was discovered during gas sales line abandonment. The release is located on another operator's location with potentially multiple operators. PDC is investigating to confirm the release source. The release clean-up and delineation activities are in-process. Groundwater has not been encountered.

On September 20th, 2023,

- CPW was notified that an historic release was discovered within 300 ft of waters of the state,
- Wattenberg Improvement Association, Rachel DeHerrera was notified of an historic release was discovered within the external buffer
- This contact information could not be populated below due to the 19S business rules.

**List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):**

**OTHER NOTIFICATIONS**

<u>Date</u>	<u>Agency/Party</u>	<u>Contact</u>	<u>Phone</u>	<u>Response</u>
9/1/2023	Surface Owner	NA	-	
9/1/2023	Weld Co	NA	-	
9/1/2023	ECMC	Laurel Anderson	-	

**REPORT CRITERIA**

**Rule 912.b.(1) Report to the Director (select all criteria that apply):**

- ☐ **Yes** Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.
- Waters of the State: Threatened to Impact Public Water System: Threatened to Impact
- Residence or Occupied Structure: n/a Livestock: n/a
- Wildlife: n/a Publicly-Maintained Road: n/a
- ☐ **No** Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.
- ☐ **No** Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.
- ☐ **No** Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak
- Enter the approximate time of discovery \_\_\_\_\_ (HH:MM)
- Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 \_\_\_\_\_
- Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? \_\_\_\_\_
- Enter the Document Number of the Initial Accident Report, Form 22 \_\_\_\_\_
- Was there damage during excavation? \_\_\_\_\_
- Was CO 811 notified prior to excavation? \_\_\_\_\_
- ☐ **No** Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.
- Estimated Volume of Impacted Solids (cu. yd.): \_\_\_\_\_

No	Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:
	<input type="checkbox"/> The presence of free product or hydrocarbon sheen Surface Water <input type="checkbox"/> The presence of free product or hydrocarbon sheen on Groundwater <input type="checkbox"/> The presence of contaminated soil in contact with Groundwater <input type="checkbox"/> The presence of contaminated soil in contact with Surface water
Yes	Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylightis from the subsurface.
No	Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.
	<input type="checkbox"/> Areas offsite of Oil & Gas Location <input type="checkbox"/> Off-Location Flowline right of way
No	Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.
No	Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

## SPILL/RELEASE DETAIL REPORTS

#1	Supplemental Report Date: 09/20/2023		
<b>FLUIDS</b>	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE			<input checked="" type="checkbox"/>
PRODUCED WATER	0	0	<input type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<input type="checkbox"/>
specify: _____			
Was spill/release completely contained within berms or secondary containment? <u>NO</u> Was an Emergency Pit constructed? <u>NO</u>			
<i>Secondary containment, <b>including walls &amp; floor regardless of construction material</b>, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.</i>			
<b>A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit</b>			
Impacted Media (Check all that apply) <input checked="" type="checkbox"/> Soil <input type="checkbox"/> Groundwater <input type="checkbox"/> Surface Water <input type="checkbox"/> Dry Drainage Feature			
Surface Area Impacted:    Length of Impact (feet): <u>14</u>		Width of Impact (feet): <u>4</u>	
Depth of Impact (feet BGS): <u>7</u>		Depth of Impact (inches BGS): _____	
How was extent determined?			
On August 31, 2023, a historic release was confirmed during decommissioning activities at the Briggs Aggregate 1-25 Tank Battery at a direction change in gas sales line, following the receipt of preliminary analytical results. During the discovery of the release, mitigation activities were initiated and to date, approximately 9 cubic yards of impacted material have been removed and transported to the Republic Services Landfill for disposal under a PDC waste manifest. On August 30, 2023, two soil samples (SL01-06-S & SL01-06-B) were collected from impacted source material adjacent to the gas sales line at depths of approximately 6 feet and 7 feet below ground surface (bgs), respectively. The soil samples were submitted for laboratory analysis of the Table 915-1 organics (BTEX, naphthalene, 1,2,4-trimethylbenzene, (TMB), 1,3,5-TMB, TPH (C6-C36) and PAHs). Preliminary analytical results indicated that organic compounds were in exceedance of the applicable Table 915-1 protection of groundwater SSLs in soil sample SL01-06-S. Final analytical results are pending.			
Soil/Geology Description:			
Dacono clay loam, 1 to 3 percent slopes; Olney fine sandy loam, 1 to 3 percent slopes			
Depth to Groundwater (feet BGS) <u>10</u>		Number Water Wells within 1/2 mile radius: <u>23</u>	
If less than 1 mile, distance in feet to nearest		Water Well <u>830</u> None <input type="checkbox"/>	Surface Water <u>155</u> None <input type="checkbox"/>

Springs      None ☒

Occupied Building 819 None 

Additional Spill Details Not Provided Above:

The well associated with the sales line has been shut-in for several years. Flowline integrity tests demonstrate confirm flowline integrity. PDC is investigating to confirm the source of the impact as there are several other operators on location.

## CORRECTIVE ACTIONS

#1 Supplemental Report Date: 09/20/2023

Root Cause of Spill/Release	Unknown (Historical)
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Other (specify) \_\_\_\_\_

Type of Equipment at Point of Spill/Release: Other

If "Other" selected above, specify or describe here:

Source of release is currently unknown.

Describe Incident & Root Cause (include specific equipment and point of failure)

PDC has not operated this sales line since 2017 and the last sales line integrity test was conducted on January 31st 2020, was a passing test. The source of the release is under investigation and the results will be submitted on a supplementary 19.

Describe measures taken to prevent the problem(s) from reoccurring:

The source of the release is under investigation and the results will be submitted on a supplementary 19.

Volume of Soil Excavated (cubic yards): 9

Disposition of Excavated Soil (attach documentation) ☒ Offsite Disposal ☐ Onsite Treatment☐ Other (specify) \_\_\_\_\_

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbbs):	0
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## REQUEST FOR CLOSURE

**Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.**

Basis for Closure: ☐ Corrective Actions Completed (documentation attached, check all that apply)

☐ Horizontal and Vertical extents of impacts have been delineated.

☐ Documentation of compliance with Table 915-1 is attached.

☐ All E&P Waste has been properly treated or disposed.

☐ Work proceeding under an approved Form 27 (Rule 912.c).

Form 27 Remediation Project No:

☐ SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

**OPERATOR COMMENTS:**

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: \_\_\_\_\_ Print Name: Phillip Porter

Title: Sr. Env. Rep Date: 09/21/2023 Email: taspillremediationcontractor@pdce.com

### COA Type

### Description

	<p>Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.</p> <p>Based on field documentation and Form 19 Supplemental is due by November 28, 2023.</p>
	<p>Operator shall provide any email correspondence with Colorado Parks and Wildlife/Administrators of the Public Water System as an attachment to the subsequent Supplemental Form 19.</p>
	<p>Per comment on Doc #403524641: "Per Rule 912.b.(1).G Operator was required to provide notification within 24 hours of a suspected spill/release. Photo Documentation attached indicates a suspected release was identified on August 30th, 2023, when elevated PIDs and hydrocarbon staining and odor were observed at three soil sample locations. Operator provided a late 24-hour notification and has listed the incorrect Date of Discovery. Operator shall update the replacement Supplemental Form 19 with the correct Date of Discovery."</p> <p>The subject form states: "On August 31, 2023, a historic release was discovered during decommissioning activities at the Briggs Aggregate 1-25 Tank Battery".</p> <p>Operator has not updated the Spill/Release Detail Report section to reflect the correct Date of Discovery. Operator shall clarify this discrepancy on the subsequent Supplemental Form 19 for the record.</p>
3 COAs	

### Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403535753	SPILL/RELEASE REPORT(SUPPLEMENTAL)
403535843	TOPOGRAPHIC MAP
403535845	AERIAL IMAGE
403535847	ANALYTICAL RESULTS
403535851	PHOTO DOCUMENTATION
403548027	FORM 19 SUBMITTED

Total Attach: 6 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC added previously submitted Form 19's to the related Forms tab.	10/03/2023

Total: 1 comment(s)