

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404106059

Receive Date:

Report taken by:

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 ECOM 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>1099 18TH STREET SUITE 1500</u>		Phone: <u>(303) 860-5800</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Karen Olson</u>	Email: <u>karen.olson@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19470 Initial Form 27 Document #: 402756583

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>123-13798</u>	County Name: <u>WELD</u>
Facility Name: <u>GUTFELDER AMOCO 14-19</u>	Latitude: <u>40.291416</u>	Longitude: <u>-104.828102</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>19</u>	Twps: <u>4N</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 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 - 388 feet SW, Surface Water: Unnamed Irrigation Ditch - 66 feet N, Occupied Buildings: 350 feet SW / 436 feet SW, Livestock: 258 feet SW, FWS Wetlands: Freshwater Emergent Wetland (PEM1A) - 148 feet NW, HPH: Mule Deer Migration Corridor - 398 feet NW, Mule Deer Severe Winter Range - 1,115 feet NW, Bald Eagle Half-Mile Nest (1/2-mile bound) - 1,245 feet NNW, Aquatic Native Species Conservation Waters - 1,305 feet NW

Flowline conflict apparent as it crosses surface water canal (appears to be an irrigation ditch) just before entering separator

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	Refer to Document #403898706	Lab Analysis if Encountered
Yes	SOILS	Refer to Document #403898706	Lab Analysis and Field Screening

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the Gutfelder Amoco 14-19 wellhead cut and cap and flowline full removal. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken along the flowline any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. A detailed summary of the wellhead and flowline decommissioning activities, including field notes, site photos, and laboratory analytical results, is attached to ECMC Document No. 402871027. Per the COA issued in ECMC Document Number 402879851, the Form 44 Number is 402879851 and is included in the Related Forms Tab of this submittal.

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):

A grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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):

Visual inspection of the wellhead and flowline areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to ECMC Document No. 402871027.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 28
Number of soil samples exceeding 915-1 10
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 1000

NA / ND

-- Highest concentration of TPH (mg/kg) 89.68
-- Highest concentration of SAR 7.73
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 17

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 October 4, 2021, two background samples (BKG01) were collected at 3 feet and 6 feet bgs from native material topographically up-gradient of the wellhead location and submitted for analysis of pH and SAR.

Additionally, on March 30, 2022, five background soil samples (BKG02) were collected at approximately 3 feet, 4 feet, 5 feet, 6 feet, and 10 feet bgs, from native material east of the former wellhead and were submitted for analysis of pH.

Based on the results, pH and/or SAR and/or arsenic exceedances remain at several soil sample locations (WH01@6', SB04@3', SB04@5', SB04@6', SB04@10', SB06@10', SB06@15', SB06@17', SB08@10', SB08@15'). A detailed summary of laboratory analytical results, is attached to ECMC Document No. 403898706.

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

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

Based on the analytical results from decommissioning and site investigation activities, a supplemental site investigation (SSI) will be completed to horizontally delineate the remaining pH exceedances observed around the former wellhead and soil borings SB04, SB06, and SB08 and to confirm Table 915-1 compliance within and adjacent to the former wellhead and flowline. Soil samples will be submitted for laboratory analysis of full Table 915-1 suite.

Concurrent with site investigation activities, additional background samples will be collected around the former wellhead and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron to continue to assess native soil conditions at the site.

The proposed soil boring locations are illustrated on Figures 1 and 2.

The SSI is tentatively scheduled to take place on April 28, 2025 and the results of which will be submitted on a subsequent Form 27.

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.

No impacted material caused by oil and gas operations was identified at this time.

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 February 24, 2023, two soil borings (SB06 and SB08) were advanced via direct push drilling methods to confirm and delineate the vertical and horizontal extents of the pH exceedances observed in soil boring SB04. Ten soil samples were collected between 3 feet and 17 feet bgs and were submitted for laboratory analysis of pH. Laboratory results indicated pH was observed outside of ECMC Table 915-1 standards in both soil borings; however, was delineated vertically from soil adjacent to WH01. During soil boring advancement activities, slightly elevated PID readings were observed in soil boring SB06. Consequently, one soil sample (SB06@15') was collected from the interval exhibiting the highest PID concentration as well as the terminus of the soil boring (SB06@17'), and were submitted for laboratory analysis of the Full ECMC Table 915-1 analytical suite. Laboratory results indicated organic compound concentrations were below the applicable ECMC Table 915-1 standards. pH and arsenic were observed in exceedances of applicable ECMC Table 915-1 standards in SB06. Due to equipment malfunctions, the remainder of the soil borings proposed on previous supplemental form 27s were unable to be completed. A detailed summary of sampling activities and analytical results is attached to ECMC Document No. 403898706.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC 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.

Groundwater was not encountered during decommissioning or site investigation 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 First Quarter 2025 - Timeline Update

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.

- Further soil investigation/delineation is required.

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: \$ 15000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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 _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC 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? _____

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 ECMC 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 removal activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with ECMC 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. 08/16/2021

Proposed date of completion of Reclamation. 07/14/2027

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. 05/24/2021

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/16/2021

Proposed site investigation commencement. 04/28/2025

Proposed completion of site investigation. 05/05/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/16/2021

Proposed date of completion of Remediation. 12/31/2025

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:

Proposed completion of site investigation date is being updated to reflect the schedule to complete the supplemental site investigation. The ECMC will be updated on a subsequent Form 27 with the results of the supplemental site investigation. The SSI is tentatively scheduled to take place on April 28, 2025.

OPERATOR COMMENT

This Supplemental Form 27 is being submitted as a first quarter 2025 timeline update for the former Gutfelder Amoco 14-19 wellhead and flowline.

A detailed summary of February 2023 site investigation activities and analytical results, is attached to ECMC Document No. 403898706.

Based on the analytical results from decommissioning and site investigation activities, a supplemental site investigation (SSI) will be completed to continue to horizontally delineate the remaining pH exceedances observed around the former wellhead and soil borings SB04, SB06, and SB08 and to confirm Table 915-1 compliance within and adjacent to the former wellhead and flowline. Soil samples will be submitted for laboratory analysis of full Table 915-1 suite.

Concurrent with site investigation activities, additional background samples will be collected around the former wellhead and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron to determine if the inorganic exceedances are attributed to native soil conditions at the site.

The proposed soil boring locations are illustrated on Figures 1 and 2. The SSI is tentatively scheduled to take place on April 28, 2025 and the results of which will be submitted on a subsequent Form 27.

Per the COA issued in ECMC Document Number 402879851, the Form 44 Number is 402879851 and is included in the Related Forms Tab of this submittal.

Quarterly reporting will be conducted until closure criteria are achieved.

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

Signed: Jesse Marcus

Title: Environmental Consultant

Submit Date: _____

Email: tas-chevron-2@tasman-geo.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: _____

Date: _____

Remediation Project Number: 19470

COA Type

Description

<u>COA Type</u>	<u>Description</u>
0 COA	

ATTACHMENT 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

404125652	SITE INVESTIGATION PLAN
404125653	SITE INVESTIGATION PLAN

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)