

STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

PDC Williamson 43-12: Supplemental Spill/Release Report #401004170

1 message

Allison - DNR, Rick <rick.allison@state.co.us>
To: Zack Liesenfeld <zack.liesenfeld@pdce.com>
Cc: "Axelson, John" <john.axelson@state.co.us>

Thu, Mar 17, 2016 at 11:13 AM

Zack,

COGCC is reviewing the Request for Closure submitted by PDC Energy, Inc. on Form 19 Document #401004170 for the release discovered during the removal a produced water vessel at the Williamson 43-12. In the Form 19, PDC states that 550 barrels of ground water were removed from the excavation, and a ground water sample collected from the excavation after the removal of the ground water contained a benzene concentration of 5.1 micrograms per liter. Soil analytical data shows that soil impacts in the unsaturated zone have been removed from the location. PDC also requested COGCC to grant No Further Action for this release, given the low perceived risk that dissolved hydrocarbon impacts pose at the site.

COGCC does not have a program to grant No Further Action to sites where concentrations of the hydrocarbons listed in Table 910-1 remain in soil or ground water in excess of the Table 910-1 Concentrations. At this site, it appears the ground water was removed from the excavation for a period between February 25 and March 8, and no ground water analytical data was supplied to document the degree of impact to ground water before beginning the removal of ground water.

COGCC Environmental Staff has discussed similar scenarios and in many cases closure may be granted without four quarters of ground water monitoring in the following scenario: if the follow up grab ground water sample from the excavation is below the Table 910-1 Concentration Level, samples from an appropriate array of monitoring points are also Table 910-1, and it has been verified that remaining soil complies with Table 910-1. COGCC Staff will review these requests on a site by site basis. If there is not a monitoring point in close proximity to the original source, or there are sensitive area concerns or potential receptors, we may ask for additional monitoring to assure no residual impacts are contaminating groundwater.

For this site, please submit a Form 27 Site Investigation and Remediation Workplan with a proposal for additional investigation. Since we have a Form 19 in process, you can just email the Form 27 to me and I will change the request for closure to "Work Proceeding under approved Form 27" when I assign the Remediation Project number. PDC may not need to complete four quarters of monitoring at this site, depending on the results of additional assessment.

Please contact me with any questions.

Rick

Rick Allison, P.G.

Environmental Protection Specialist, Northeast Colorado



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----- Forwarded message -----

From: **OGCC Notification** <dnr_eforms.helpdesk@state.co.us>
Date: Tue, Mar 15, 2016 at 10:32 AM
Subject: Supplemental Spill/Release Report #401004170
To: rick.allison@state.co.us



Colorado

Oil & Gas Conservation Commission

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Supplemental Spill/Release Report

Operator Num: 69175
Operator Name: PDC ENERGY INC
Contact Name: Liesenfeld, Zack
Phone Num: (970) 506-9273
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COGCC has been notified of Supplemental Spill/Release Report