

State of Colorado Oil and Gas Conservation Commission

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401527025

Receive Date:

01/29/2018

Report taken by:

RICK ALLISON

Site Investigation and Remediation Workplan (Initial 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

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>Karen.Olson@pdce.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10954Initial Form 27 Document #: 401527025

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water |
| <input checked="" type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste | <input type="checkbox"/> Rule 906.c.: Director request |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____ |

SITE INFORMATION

N Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>327580</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>BILLINGS-66N66W 21NESE</u>		Latitude: <u>40.472883</u>	Longitude: <u>-104.776822</u>
		** correct Lat/Long if needed: Latitude: <u>40.472928</u>	Longitude: <u>-104.774587</u>
QtrQtr: <u>NESE</u>	Sec: <u>21</u>	Twp: <u>6N</u>	Range: <u>66W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use AgricultureIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

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 type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input 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
No	GROUNDWATER	Please refer to Doc # 401524197	Groundwater sampling.
Yes	SOILS	Please refer to Doc # 401524197	Excavation and 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 January 11, 2018, historic hydrocarbon impacts were discovered beneath the produced water vessel during plug and abandonment activities at the Billings 43, 44-21 production facility. Approximately 340 cubic yards of impacted material were excavated and transported to the North Weld Landfill in Ault, Colorado for disposal under PDC waste manifests.

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):

Eight (8) soil samples (SS01 - SS08) were collected from the sidewalls of the excavation and one test pit at approximately 9 feet below ground surface (bgs). The soil samples were submitted to Summit Scientific Laboratories in Golden, Colorado for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260B, and TPH - diesel range organics (DRO) by USEPA Method 8015. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 910-1 standards in the five soil samples (SS03 - SS04, and SS06 - SS08) collected from the final excavation extent.

Proposed Groundwater Sampling

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

Groundwater was encountered in the excavation at approximately 11 feet bgs. Concurrent to excavation activities, approximately 100 barrels of groundwater were removed via vacuum recovery and transported to a licensed disposal facility. On January 23, 2018, one groundwater sample (GW01) was collected from the excavation and submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results indicated that constituent concentrations were below the applicable regulatory standards in the groundwater sample.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 8

Number of soil samples exceeding 910-1 2

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 1110

NA / ND

-- Highest concentration of TPH (mg/kg) 2150

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 11

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 11'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 21

-- Highest concentration of Xylene (µg/l) 69

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 Number of surface water samples exceeding 910-1

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?

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

Volume of solid waste (cubic yards) 340

Volume of liquid waste (barrels) 100

☐ Is further site investigation required?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 340 cubic yards of impacted material were excavated and transported to the North Weld Landfill in Ault, Colorado for disposal under PDC waste manifests.

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.

Eight (8) soil samples (SS01 - SS08) were collected from the sidewalls of the excavation and one test pit at approximately 9 feet below ground surface (bgs). The soil samples were submitted to Summit Scientific Laboratories in Golden, Colorado for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260B, and TPH - diesel range organics (DRO) by USEPA Method 8015. Analytical results indicated that organic compound concentrations were in compliance with applicable COGCC Table 910-1 standards in the five soil samples collected from the final excavation extent. Based on the analytical results, hydrocarbon impacts in exceedance of regulatory standards were successfully removed during excavation activities.

Soil Remediation Summary

☐ In Situ

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

☒ Ex Situ

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 340
Name of Licensed Disposal Facility or COGCC 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.

Based on the groundwater analytical results, dissolved-phase hydrocarbon impacts were not present on site.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Produced Water Vessel Closure

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Produced Water Vessel Closure

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 340

E&P waste (solid) description Non-hazardous E&P waste.

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: North Weld Landfill

Volume of E&P Waste (liquid) in barrels 100

E&P waste (liquid) description Groundwater

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Licensed disposal facility.

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 excavation activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The tank battery was not reconstructed. The location will be reclaimed in accordance with COGCC Rule 1004.

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 approve the seed mix?

If NO, does the seed mix comply with local soil conservation district recommendations?

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required.

Actual Spill or Release date, if known.

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/11/2018

Date of commencement of Site Investigation. 01/11/2018

Date of completion of Site Investigation.

REMEDIAL ACTION DATES

Date of commencement of Remediation. 01/11/2018

Date of completion of Remediation. 01/23/2018

SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

OPERATOR COMMENT

PDC is submitting site investigation details for the produced water closure at the Billings 43, 44-21 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 EHS Manager

Submit Date: 01/29/2018

Email: Karen.Olson@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: 02/01/2018

Remediation Project Number: 10954

COA Type**Description**

	Submit a Form 27 Supplemental Report to request closure for this project.
	Based on the information presented, it appears that no further 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 ground water is found to be impacted, then further investigation and/or remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.

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**

401527025	FORM 27-INITIAL-SUBMITTED
401527123	SITE MAP
401527127	ANALYTICAL RESULTS
401527148	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)