

State of Colorado Oil and Gas Conservation Commission

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401492610

Receive Date:

01/11/2018

Report taken by:

RICK ALLISON

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.

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 #: 10797Initial Form 27 Document #: 401476521

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

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>305512</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DILLARD-67N64W 20NENE</u>		Latitude: <u>40.563813</u>	Longitude: <u>-104.566527</u>
		** correct Lat/Long if needed: Latitude: <u>40.564017</u>	Longitude: <u>-104.568281</u>
QtrQtr: <u>NENE</u>	Sec: <u>20</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>305873</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DILLARD-67N64W 20SENE</u>		Latitude: <u>40.560420</u>	Longitude: <u>-104.566360</u>
		** correct Lat/Long if needed: Latitude: <u>40.558959</u>	Longitude: <u>-104.564498</u>
QtrQtr: <u>SENE</u>	Sec: <u>20</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>310591</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>EDWARDS-65N67W 16SWSW</u>		Latitude: <u>40.396030</u>	Longitude: <u>-104.902670</u>
		** correct Lat/Long if needed: Latitude: <u>40.394202</u>	Longitude: <u>-104.906041</u>
QtrQtr: <u>SWSW</u>	Sec: <u>16</u>	Twp: <u>5N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type:	LOCATION	Facility ID:	319492	API #:		County Name:	WELD				
Facility Name:		HARDMAN-65N67W 16NWSW		Latitude:	40.397830	Longitude:	-104.900170				
				** correct Lat/Long if needed: Latitude:		40.394193	Longitude:	-104.906939			
QtrQtr:	NWSW	Sec:	16	Twp:	5N	Range:	67W	Meridian:	6	Sensitive Area?	Yes

SITE CONDITIONS

General soil type - USCS Classifications	SM	Most Sensitive Adjacent Land Use	Various
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

Various

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
No	SOILS	No impacted material encountered.	Excavation and 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.

As required by COGCC Rule 905.B, a soil sample will be collected when buried or partially buried produced water vessels are removed from service. One soil sample will be collected below the removed water vessel and submitted for laboratory analysis of identified Table 910-1 chemicals-of-concern (COC's) which include benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) – gasoline range organics (GRO), TPH – diesel range organics (DRO), electrical conductivity (EC), and pH. The soil sample will be analyzed for sodium adsorption ratio (SAR) should initial EC concentrations exceed Table 910-1 soil standards. Excavation sidewalls will be field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Should elevated PID readings be observed on the excavation sidewalls, soil samples will be collected and analyzed for the above referenced organic and inorganic compounds. If shallow groundwater is encountered during the produced water vessel removal, a groundwater sample will be collected and submitted for laboratory analysis of BTEX.

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):

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 4

Number of soil samples exceeding 910-1 1

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

Approximate areal extent (square feet) 100

NA / ND

ND Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

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)

Volume of liquid waste (barrels)

☐ Is further site investigation required?

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.

Any soil impacted above COGCC Table 910-1 standards was removed from the excavation area. Impacted soil in exceedance of Table 910-1 standards for only EC, pH, or SAR will not be removed below the root zone (established at 3 feet below ground surface, per COGCC guidance).

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.

Reference Blanket Remediation # 9440.

Soil Remediation Summary

☐ In Situ

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

☐ Ex Situ

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ 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

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
No _____ Natural Attenuation
No _____ 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.

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? 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 _____

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? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? _____

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? _____

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. If the facility was decommissioned, the location was 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? No

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

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). 11/16/2017

Date of commencement of Site Investigation. 11/16/2017

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 11/16/2017

Date of completion of Remediation. 11/30/2017

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

PDC is submitting produced water vessel closure requests for the following sites: Hardman 1, 2, 3, 4; Edwards 16 BU; Dillard 31, 41-20; and Dillard 32, 42-20.

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: 01/11/2018 _____

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: 10797 _____

COA Type

Description

	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.
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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

401492610	FORM 27-SUPPLEMENTAL-SUBMITTED
401492649	SITE INVESTIGATION REPORT
401492662	SITE INVESTIGATION REPORT
401492751	SITE INVESTIGATION REPORT
401492767	SITE INVESTIGATION REPORT

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Form 27 received with B&B 10-11 Tank Battery removed from the project. Pending receipt of separate Form 27 for B&B 10-11 Tank Battery	01/18/2018
Environmental	<p>COGCC is returning this Form 27 to Draft.</p> <p>The Closure Report for the B&B 10-11 Tank Battery (Facility 305289) states that 60 yards of impacted material were removed and disposed, but only one soil sample was collected from the base of the excavation, at 10 feet below ground surface. While the impact of 60 yards of material may or may not constitute 1 bbl of released liquid and require a release report, it does constitute impact to the environment.</p> <p>Per Rule 910.b.(3), "if soil contamination is suspected or known to exist as a result of spills/releases or E&P waste management, representative samples of soil shall be collected and analyzed in accordance with this Rule."</p> <p>Rule 910.b.(3)B. clarifies that "samples shall be collected from areas most likely to have been impacted, and the horizontal and vertical extent of contamination shall be determined. The number and location of samples shall be appropriate to the impact."</p> <p>Please remove the B&B 10-11 Tank Battery from this Form 27 and submit a Form 27 Initial Site Investigation and Remediation Workplan for the B&B 10-11 location to define the extent of impacts in the horizontal directions. Then resubmit the Form 27 without the B&B 10-11 location.</p>	01/08/2018

Total: 2 comment(s)