

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
401853277
Receive Date:
12/05/2018
Report taken by:
BOB CHESSON

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 INFORMATON

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 11901 Initial Form 27 Document #: 401785274

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 checked="" 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 Facilites (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>322577</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>GRAZNAK-63N64W 19W2SW</u>	Latitude: <u>40.207000</u>	Longitude: <u>-104.599140</u>	
	** correct Lat/Long if needed: Latitude: <u>40.206670</u>	Longitude: <u>-104.599514</u>	
QtrQtr: <u>W2SW</u>	Sec: <u>19</u>	Twp: <u>3N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? No 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

Surface water is located approximately 361 feet east of the location.

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	Not defined.	Implementation of site investigation plan.
Yes	SOILS	Refer to Figure 1 and Table 1.	Excavation and sampling activities.

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 August 31, 2018, historic hydrocarbon impacts were discovered below the produced water vessel and separator during tank battery decommissioning activities at the Butterball B4, 13, 14, 23, 24-19; Graznak 1-19 production facility. Following the discovery, excavation activities were initiated to remove remaining petroleum hydrocarbon impacts below the former produced water vessel. Approximately 1,470 cubic yards of impacted material were removed and transported to the Buffalo Ridge Landfill in Keenesburg, 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):

Between September 4 and September 21, 2018, forty-eight (48) soil samples (SS01 - SS11 and E-SS01 - E-SS37) were collected from the base and sidewalls of the final extent of the eastern and western excavations at depths ranging between 3 feet and 14 feet bgs. Soil samples were collected from the unsaturated and saturated intervals in both excavations to confirm that the horizontal and vertical extent of soil impacts were successfully removed. All samples were submitted to Summit Scientific Laboratory in Golden, Colorado for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by USEPA Method 8260B, and TPH - diesel range organics (DRO) by USEPA Method 8015. Analytical results indicated that organic compound concentrations were in compliance with the applicable COGCC Table 910-1 standards in the soil samples collected from the base and sidewalls of both final excavation extents.

Proposed Groundwater Sampling

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

During initial excavation activities, groundwater was encountered in the western excavation at approximately 4 feet below ground surface (bgs) and 6 feet bgs in the eastern excavation. Groundwater recovery activities were conducted concurrent with excavation activities and a total of approximately 3,700 barrels of groundwater were removed from both excavations and transported to a licensed disposal facility. On September 8, 2018, one groundwater sample (GW01) was collected from the western excavation and submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results indicated that BTEX concentrations were below the applicable COGCC Table 910-1 groundwater standards. On September 26, 2018, a second groundwater sample (E-GW01) was collected from the eastern excavation and submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results indicated that the constituent concentrations were below applicable regulatory standards.

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):

On November 8, 2018, eight (8) temporary monitoring wells were installed via direct-push drilling methods within and in cardinal directions of the former excavation extent to confirm dissolved-phase hydrocarbon concentrations are below regulatory standards. The monitoring well locations are illustrated on Figure 1.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 48
Number of soil samples exceeding 910-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 4703

NA / ND

-- Highest concentration of TPH (mg/kg) 883
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 14

Groundwater

Number of groundwater samples collected 2
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 6'
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 910-1 0

-- Highest concentration of Benzene (µg/l) 4.6
ND Highest concentration of Toluene (µg/l)
ND Highest concentration of Ethylbenzene (µg/l)
-- Highest concentration of Xylene (µg/l) 3
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) 1470 Volume of liquid waste (barrels) 3700

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.

Between August 31 and September 21, 2018, approximately 1,470 cubic yards of petroleum hydrocarbon impacted material were excavated and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal under PDC waste manifests. As previously described, confirmation soil samples collected from the final extent of both excavations indicated that unsaturated and saturated impacted material were successfully removed by excavation activities.

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 November 8, 2018, eight (8) monitoring wells (BH01 - BH08) were installed via direct-push drilling methods to confirm dissolved-phase hydrocarbon concentrations remained below regulatory standards following remediation activities. On November 14, 2018, groundwater monitoring was conducted at all eight (8) monitoring well locations at the site. Groundwater samples were submitted to Summit for analysis of BTEX by USEPA Method 8260B. Analytical results indicated that BTEX concentrations were below laboratory detection limits in all eight (8) monitoring well locations. Groundwater analytical results are summarized in Table 1 and illustrated on Figure 1.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 1470

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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.

PDC feels that the groundwater analytical data collected from the excavation and eight (8) monitoring wells demonstrates that dissolved-phase hydrocarbon impacts are not present within and surrounding the former source area. Therefore, PDC is requesting a No Further Action (NFA) determination for this location.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other No Further Action (NFA) Request

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other No Further Action (NFA) Request

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 1470

E&P waste (solid) description E&P contaminated soil.

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Buffalo Ridge Landfill

Volume of E&P Waste (liquid) in barrels 3700

E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater.

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Licensed 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? No

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.

The excavation areas were backfilled, compacted, and re-graded to match pre-existing conditions. The produced water vessel and associated production infrastructure were decommissioned following excavation activities. The former facility location will be reclaimed in accordance with COGCC 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 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. 08/31/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/31/2018

Date of commencement of Site Investigation. 08/31/2018

Date of completion of Site Investigation. 11/14/2018

REMEDIAL ACTION DATES

Date of commencement of Remediation. 08/31/2018

Date of completion of Remediation. 11/14/2018

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Based on the site investigation and groundwater data described herein, PDC is requesting a No Further Action (NFA) determination for this remediation project.

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 Program Manager

Submit Date: 12/05/2018

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: BOB CHESSON

Date: 12/06/2018

Remediation Project Number: 11901

COA Type**Description**

COA Type	Description

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**

401853277	FORM 27-SUPPLEMENTAL-SUBMITTED
401854180	GROUND WATER SAMPLE LOCATION
401854181	GROUND WATER ELEVATION MAP
401854188	ANALYTICAL RESULTS

Total Attach: 4 Files

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

Environmental	The COGCC has reviewed the NFA request for Project/Remediation #11901. Based on the information presented, no further action is necessary at this time. However, should future conditions at the site indicate contaminant concentrations in soils or groundwater exceeding COGCC standards then further investigation and/or remediation activities may be required at the site. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.	12/06/2018
---------------	--	------------

Total: 1 comment(s)