

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

401985342

Receive Date:

03/26/2019

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>	<b>Phone Numbers</b>
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>COGCCSpillRemediation@pdce.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 12989Initial Form 27 Document #: 401985342

#### 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>319434</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>ANDERSON-66N66W 10NENE</u>		Latitude: <u>40.508243</u>	Longitude: <u>-104.756482</u>
		** correct Lat/Long if needed: Latitude: <u>40.509824</u>	Longitude: <u>-104.755274</u>
QtrQtr: <u>NENE</u>	Sec: <u>10</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? NoIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? Yes

#### Other Potential Receptors within 1/4 mile

An irrigation pond is located approximately 450 feet west of location. Occupied housing is located approximately 821 feet north of location.

## 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	Refer to Figure 1 and Table 1.	Completion of excavation activities and confirmation 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 1

Number of soil samples exceeding 910-1 0

Was the areal and vertical extent of soil contamination delineated? No

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) 5

### 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           

Number of groundwater samples exceeding 910-1           

           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

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

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

As previously described, the confirmation soil sample collected from the final extent of the excavation indicated that hydrocarbon impacts were removed or not encountered during the removal of the produced water vessel.

## 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.

No impacts were encountered during the removal of the produced water vessel.

## 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

- ☐ \_\_\_\_\_ 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.

## REMEDATION 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:

## 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 facility was decommissioned, and the location will be reclaimed in accordance with the 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.

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/06/2019

Date of commencement of Site Investigation. 03/06/2019

Date of completion of Site Investigation. 03/06/2019

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/06/2019

Date of completion of Remediation. 03/06/2019

### SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

**OPERATOR COMMENT**

PDC Energy is submitting site investigation details for the Anderson 1-10 location.

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: ` 03/26/2019

Email: COGCCSpillRemediation@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: 04/01/2019

Remediation Project Number: 12989

**COA Type****Description**

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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**

401985342	FORM 27-INITIAL-SUBMITTED
401985405	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

Environmental	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 groundwater 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.  Operator is directed to submit a Form 27 Supplemental Report to close this project.	04/01/2019
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Total: 1 comment(s)