

State of Colorado Oil and Gas Conservation Commission

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 4826 Initial Form 27 Document #: 200222486

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 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 Facilities (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>306719</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>BOOTH-64N63W 31NWNW</u>		Latitude: <u>40.274310</u>	Longitude: <u>-104.487470</u>
		** correct Lat/Long if needed: Latitude: <u>40.272719</u>	Longitude: <u>-104.485394</u>
QtrQtr: <u>NWNW</u>	Sec: <u>31</u>	Twp: <u>4N</u>	Range: <u>63W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Location is located in open range. Livestock is present around 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
Yes	SOILS	TBD	Implementation of Site Investigation Plan.

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 July 28, 2008, petroleum hydrocarbon impacts were discovered below the dump lines during routine maintenance at the Booth 11, 12, 21, 22-31U & 31AU tank battery. Following the discovery, an estimated 3,800 cubic yards of impacted material was removed from the source area. The approximate dimensions of the excavation were 40 feet wide by 50 feet long with a depth of 35 feet bgs. Excavation oversight and sampling were conducted by LT Environmental (LTE). Soil sample results indicated that organic compound concentrations were in exceedance of COGCC Table 910-1 standards within the final extent of the excavation.

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):

Five (5) boreholes will be advanced around the former excavation extent to determine the extent of remaining hydrocarbon impacts associated with the July 2008 release (Figure 1). The boreholes will be advanced using hollow stem auger drilling methods. Lithologic descriptions and volatile organic compound (VOC) concentrations measured using a photoionization detector (PID) will be recorded in each borehole. Soil samples will be collected from intervals most likely to be impacted based on visual observations and field measured VOC concentrations. Soil samples will be submitted to Summit Scientific Laboratories (Summit) for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbon (TPH) - gasoline range organics (GRO) by EPA Method 8260B, and TPH - diesel range organics (DRO) by EPA Method 8015. Based on analytical results collected during the site investigation, additional boreholes may be advanced to delineate remaining impacts.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation, monitoring wells will be installed into each borehole and subsequently sampled. Groundwater samples will be submitted to Summit for laboratory analysis of BTEX by Method 8260B.

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 25

Number of soil samples exceeding 910-1 4

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

Approximate areal extent (square feet) 2900

NA / ND

-- Highest concentration of TPH (mg/kg) 12990

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 49

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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

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.

Following the discovery of the July 2008 release, an estimated 3,800 cubic yards of impacted material were removed and transported to a licensed disposal facility 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.

Between May 6 and June 4, 2019, six boreholes (SB01 - SB06) were advanced to determine the extent of potential remaining hydrocarbon impacts associated with the 2008 release. Boreholes were advanced to approximately 49 feet below ground surface (bgs) using hollow stem auger drilling. Lithologic descriptions and volatile organic compound (VOC) concentrations using a photoionization detector (PID) were collected for the entirety of each borehole. Soil samples were collected from the depth intervals which previously exhibited constituent concentrations in exceedance of COGCC Table 910 -1 standards during 2008 excavation activities. In addition, soil samples were collected from the total depth of each borehole to establish the vertical extent of impacts. Soil samples were submitted to Summit Scientific Laboratories 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) and oil range organics (ORO) by USEPA Method 8015. Analytical results indicated that benzene and TPH concentrations remained in exceedance of COGCC Table 910-1 soil standards in the soil samples collected from the source borehole (BH06). Borehole locations are illustrated on Figure 1. Soil analytical results are summarized in Table 1. Given that the lateral and vertical extents of remaining impacts have been defined and groundwater is not present, PDC has selected monitored natural attenuation (MNA) as the remedial strategy for this site. Quarterly vapor samples will be collected from the existing soil vapor extraction (SVE) well (Figure 1) to monitor VOC concentrations in soil. Vapor samples will be submitted for laboratory analysis of benzene and TPH – GRO by USEPA Method TO-15.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
Yes _____ 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.

Groundwater was not encountered during site investigation activities.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Site Investigation Report

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

☒ Other Site Investigation Report

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: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

Do all soils meet Table 910-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

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? _____

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.

The excavation area was backfilled and re-graded to match pre-existing site conditions. The facility was reconstructed and remains operational.

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). _____

Date of commencement of Site Investigation. 07/28/2008

Date of completion of Site Investigation. 06/04/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. 07/28/2008

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

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: 06/25/2019

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: BOB CHESSON

Date: 06/25/2019

Remediation Project Number: 4826

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

402043749	FORM 27-SUPPLEMENTAL-SUBMITTED
402082374	SOIL SAMPLE LOCATION MAP
402082378	ANALYTICAL RESULTS
402084132	LOGS

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)