

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402099563
Receive Date:
07/10/2019

Report taken by:
Kari Oakman

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 11750 Initial Form 27 Document #: 401743226

PURPOSE INFORMATION

<input type="checkbox"/> 901.e. Sensitive Area Determination	<input checked="" 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 checked="" 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>TANK BATTERY</u>	Facility ID: <u>436120</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SWANSON-66N66W 20SWSE</u>	Latitude: <u>40.467950</u>	Longitude: <u>-104.799470</u>	
	** correct Lat/Long if needed: Latitude: <u>40.467931</u>	Longitude: <u>-104.799569</u>	
QtrQtr: <u>SWSE</u>	Sec: <u>20</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 SM Most Sensitive Adjacent Land Use Agriculture

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

Occupied housing is located approximately 896 feet southwest of 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
Yes	GROUNDWATER	Not defined.	Completion of excavation groundwater sampling.
Yes	SOILS	Refer to Figure 1 and Table 1.	Complete of excavation 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 July 26, 2018, a historic release was discovered during plug and abandonment activities at the Swanson 34-20 tank battery. Approximately 1,040 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility 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):

Between July 26 and August 10, 2018, twenty (20) soil samples (SS01 - SS20) were collected from the sidewalls and base of the excavation extent within the unsaturated and saturated intervals at depths ranging between 6 and 10.5 feet below ground surface (bgs). 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 all soil samples collected from the final extent of the excavation exhibited constituent concentrations below the applicable COGCC Table 910-1 standards. Based on the analytical results, the lateral and vertical extents of petroleum hydrocarbon soil impacts within the unsaturated and saturated intervals were successfully defined and removed.

Proposed Groundwater Sampling

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

Groundwater was encountered within the excavation area at approximately 8 feet bgs. On August 17, 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 the benzene concentration was above the applicable COGCC Table 910-1 groundwater standards at a detection of 13 µg/L. On August 23, 2018, a second groundwater sample (GW02) was collected from the excavation and submitted for laboratory analysis of BTEX. Analytical results for the second groundwater sample confirmed that the benzene concentration remained in exceedance of 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):

Five (5) monitoring wells will be installed via direct push drilling methods to delineate the lateral extent of the dissolved-phase hydrocarbon impacts on site. In addition, during the installation of the source area monitoring well, one soil sample will be collected from the saturated interval within the former excavation area to confirm soil impacts are not present below the groundwater table at the total depth of the final excavation extent. Samples will be submitted for laboratory analysis of BTEX, naphthalene, TPH-GRO by USEPA Method 8260B, and TPH-DRO by USEPA Method 8015.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 20

Number of soil samples exceeding 910-1 1

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

Approximate areal extent (square feet) 3850

NA / ND

-- Highest concentration of TPH (mg/kg) 230

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 8'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 72

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 25

-- Highest concentration of Xylene (µg/l) 490

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) 1040

Volume of liquid waste (barrels) 2440

Is further site investigation required?

Temporary monitoring wells will be installed to delineate the extent of dissolved-phase hydrocarbon impacts. Proposed monitoring well locations are illustrated on Figure 2.

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 July 26 and August 10, 2018, approximately 1,040 cubic yards of impacted material were excavated and transported to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests. As previously described, confirmation soil samples collected from the final extent of the excavation indicated petroleum hydrocarbon impacts within the saturated and unsaturated intervals were successfully removed by excavation activities.

REMEDICATION 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 September 26, 2018, five (5) temporary monitoring wells were installed via direct push drilling methods within and in all cardinal directions of the former excavation extent. Based on the analytical results, monitored natural attenuation (MNA) was selected as the remediation strategy for this site and will remain the selected remediation strategy for the second quarter 2019.

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) _____ 1040
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
Yes _____ 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.

Quarterly groundwater sampling at the five (5) site monitoring wells (BH01 – BH05) was initiated on September 28, 2018, using USEPA Method 8260B. During the second quarter 2019, closure criteria were achieved, therefore PDC is requesting a No Further Action (NFA) determination for this remediation project.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other _____

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other _____

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 1040

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

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: North Weld Waste Management Facility.

Volume of E&P Waste (liquid) in barrels 2440

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 area was 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. 07/26/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/26/2018

Date of commencement of Site Investigation. 07/26/2018

Date of completion of Site Investigation. 06/21/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. 07/26/2018

Date of completion of Remediation. 06/21/2019

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

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: ` 07/10/2019 _____

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: Kari Oakman _____

Date: 07/11/2019 _____

Remediation Project Number: 11750 _____

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 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.
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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**

402099563	FORM 27-SUPPLEMENTAL-SUBMITTED
402099762	GROUND WATER SAMPLE LOCATION
402099894	GROUND WATER ELEVATION MAP
402100065	ANALYTICAL RESULTS

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)