FORM 27 Rev 3/16

State of Colorado
Oil and Gas Conservation Commission

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

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Report taken by: Candice (Nikki) Graber

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: DCP OPERATING COMPANY LP Operator No: 4680
Address: 370 17TH STREET - SUITE 2500
City: DENVER State: CO Zip: 80202
Contact Person: Chandler Cole Email: cecole@dcpmidstream.com

Phone Numbers
Phone: (970) 3786373
Mobile: (970) 9390329

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 14902 Initial Form 27 Document #: 402283396

PURPOSE INFORMATION

- [ ] 901.e. Sensitive Area Determination
- [ ] 909.c.(1), Rule 905: Pit or PW vessel closure
- [x] 909.c.(2), Rule 906: Spill/Release Remediation
- [ ] 909.c.(3), Rule 907.e.: Land treatment of oily waste
- [ ] 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure
- [ ] 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
- [ ] Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
- [ ] Rule 909.e.(2)B.: Closure of remediation project
- [ ] Rule 906.c.: Director request
- [x] Other Site investigation and progress summary

SITE INFORMATION

N Multiple Facilites (in accordance with Rule 909.c.)

Facility Type: SPILL OR RELEASE Facility ID: 469067 API #: County Name: WELD
Facility Name: O'Connor CND Pump Release Latitude: 40.353450 Longitude: -104.586763
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESE Sec: 31 Twp: 5N Range: 64W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications: GW
Most Sensitive Adjacent Land Use: farming crop land
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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [x] **E&P Waste**
  - [ ] Produced Water
  - [ ] Oil
  - [x] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	10' x 20'	standing liquid at time of spill and soil staining

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Initial actions and completed remedial measures have been previously submitted to the COGCC in various forms including the Form 19 Initial (Document #402231261), Form 19 Supplemental (Document #402238395, Form 19 Supplemental (#402288114) and Form 27 Initial (Document #402283396). COGCC previously issued Spill Tracking Facility ID #469067 and Remediation Project #14902 for the Site. On November 6, 2019 DCP Operations removed standing liquid condensate and impacted soils. On December 11, 12 and 20th, 2019 additional impacted soils were removed and transported to disposal facility. A Site Investigation was completed on February 5 and 18, 2020 to define the extent of the impacted soils areas and eight soil boring were advanced at locations illustrated on Figure 2 and the results are provided with this Form 27 submittal.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

- [x] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Following initial removal of impacted material and testing from around the process equipment presented in the initial Form 27 (#402283396) which indicated areas of the spill site still contained impacted material, DCP completed eight additional soil borings around the secondary containment area at illustrated on Figure 2. On February 5 and 18, borings were advanced to a depth of 3-7 feet utilizing a hydrovac rig and hand augur equipment. Soil borings were field screened at one-foot intervals using a PID. Soil Samples were collected from each location at the terminal depth interval once decreased PID readings were observed and samples were submitted for analysis of BTEX and TPH-GRO/DRO. Based on the February results, the area has been delineated, however, impacted material around the process equipment and piping that remains will be removed by hand and/or a hydrovac rig. Soil samples will be collected as confirmation that all impacted soil media was successfully removed.

Proposed Groundwater Sampling

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

Ground water has not been impacted.

Proposed Surface Water Sampling

- [ ] Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Surface water has not been impacted.

Additional Investigative Actions

- [ ] Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Analytical results from the February investigation reported six out of eight samples were below the applicable COGCC Table 910-1 standards with the exception of two locations (BH01 and BH06). However, step-out samples (BH07 and BH08) were able to confirm the horizontal extent of impacted material and delineate the area further. Remaining impacted material around these two locations (BH01 and BH06) will be removed utilizing a hydrovac rig and/or conducted by hand. Subsequent to removal of remaining impacts around these locations, up to two soil samples will be collected to determine if these remedial activities were successful. Based on the results of the confirmation sampling investigation following removal of the remaining impacts, a no further action (NFA) determination for the Site will be requested from the COGCC and the results presented in a supplemental Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 8

Number of soil samples exceeeding 910-1: 2

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

Approximate areal extent (square feet): 375

NA / ND

ND — Highest concentration of TPH (mg/kg):

NA — Highest concentration of SAR:

BTEX > 910-1: Yes

Vertical Extent > 910-1 (in feet): 7

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.

As described in the previously submitted Form 19 Initial and Form 27 Initial, source remediation efforts successfully removed the majority of the impacted material from around the process equipment and piping. Results of the November and December laboratory analysis were presented in the initial Form 27 (#402283396) and determined that two areas of the spill site still contained impacted material. On February 5 and 18th, additional removal activities utilizing a hydrovac potholing rig and hand augur equipment were completed and eight soil samples shown on Figure 2 were collected to delineate the impacted area. Soil Samples were collected from each location at the terminal depth interval once decreased PID readings were observed. Collected soil samples were submitted to the laboratory for analysis of BTEX and TPH-GRO/DRO. Analytical results from the investigation reported all samples below the applicable COGCC Table 910-1 standards with the exception of two locations. However, two additional step-out samples confirmed the horizontal extent and remaining impacts from around these two locations will be removed utilizing a hydrovac rig and/or conducted by hand. Soil analytical results are summarized on the attached Table 1 as well as on Figure 3. The February laboratory analytical report is also attached for reference. Based on the results of the confirmation sampling investigation following removal of the remaining impacts, a no further action (NFA) determination for the Site will be requested from the COGCC.

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.

Initial soil removal on November 6, 2019 was conducted using shovels and other equipment due to the spill location near process equipment and piping. Soil samples were collected on November 15, 2019 and submitted to Origins Laboratory for analysis. Results of the analysis determined that soils were still impacted. On December 11 and 12, 2019 a hydrovac was utilized to remove additional 6 inches of soil in the impacted area. Soil samples were collected December 12 and 26, 2019 and submitted to Origins Laboratory for analysis. Results of the analysis were presented in the initial Form 27 (#402283396) and determined that two areas of the spill site still contained impacted material. A hydrovac was scheduled for February 5 and 18, 2020 to remove additional soils as required and to delineate the area further. During the excavation a handheld PID (photoionization detector) was utilized for onsite screening prior to sample collection and submittal at the eight locations. Based on the observations, a few remaining impacts were encountered. Due to the difficulty of access around the process equipment and piping, it is DCP's goal to remove all remaining impacted soils during the next scheduled excavation activities. A NFA request, if warranted will be submitted following receipt of confirmation laboratory analysis results.

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) 3
  - 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.

None. No evidence of groundwater was encounterd during the soil boring investigations.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Soil Investigation Summary

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

☒ Other Soil impact investigation summary

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation?

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? 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.

Spill location is an active gas processing plant. Grading will be returned to that prior to excavation and gravel will be added as required.

Is the described reclamation complete?

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. 11/04/2019

Actual Spill or Release date, if known. 11/04/2019

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/06/2019

Date of commencement of Site Investigation.

Date of completion of Site Investigation.

REMEDIAL ACTION DATES

Date of commencement of Remediation.

Date of completion of Remediation.

SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

OPERATOR COMMENT

DCP will continue to submit updates report to COGCC via eform 27.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed:` Chandler Cole

Title: Compliance Coordinator

Submit Date:` 02/26/2020

Email: cogccnotification@dcpmidstream.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: Candice (Nikki) Graber

Date: 02/27/2020

Remediation Project Number: 14902

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
402324804	FORM 27-SUPPLEMENTAL-SUBMITTED
402324997	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)