

State of Colorado Oil and Gas Conservation Commission

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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 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 #: 12170Initial Form 27 Document #: 401856839

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 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>326785</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>MARK-64N65W 35NWSW</u>		Latitude: <u>40.267007</u>	Longitude: <u>-104.637436</u>
** correct Lat/Long if needed: Latitude: <u>40.264670</u>		Longitude: <u>-104.636270</u>	
QtrQtr: <u>NWSW</u>	Sec: <u>35</u>	Twp: <u>4N</u>	Range: <u>65W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use Ranch landIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Wetlands are located approximately 85 feet south of the 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	GROUNDWATER	Not defined.	Implementation of proposed site investigation.
Yes	SOILS	Refer to Figure 1 and Table 1.	Excavation 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.

On November 7, 2018, historic hydrocarbon impacts were discovered below the produced water vessel during plug and abandonment activities at the Mark 11, 12, 14-35 tank battery. Following the discovery, site investigation and excavation activities were initiated to delineate and remove remaining hydrocarbon impacts. Approximately 3,130 cubic yards of impacted material were removed and transported to the Buffalo Ridge Waste Management Facility 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 November 7 and November 20, 2018, fifty-eight (58) soil samples (SS01 - SS23, GS01 - GS03, and WSS01 - WSS32) were collected from the base and sidewalls of the final extent of the eastern and western excavations at depths ranging between 6 and 10 feet below ground surface (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), naphthalene, 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 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 at approximately 7 feet below ground surface (bgs). Groundwater recovery activities were conducted concurrent with excavation activities and a total of approximately 5,020 barrels of groundwater were removed from both excavations and transported to a licensed disposal facility. On November 19, 2018, one groundwater sample (GW01) was collected from the eastern 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 standard. On November 27, 2018, a second groundwater sample (W-GW01) was collected from the western excavation and submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results indicated that 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):

Nine (9) monitoring wells will be installed via direct-push drilling methods to delineate the lateral extent of the dissolved-phase hydrocarbon impacts on site. Proposed monitoring well locations are illustrated on Figure 2.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 58
Number of soil samples exceeding 910-1 3
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 13790

NA / ND

-- Highest concentration of TPH (mg/kg) 3500
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) 7'
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 910-1 1

-- Highest concentration of Benzene (µg/l) 21
-- Highest concentration of Toluene (µg/l) 4.5
-- Highest concentration of Ethylbenzene (µg/l) 3.6
-- Highest concentration of Xylene (µg/l) 710
NA 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) 3130 Volume of liquid waste (barrels) 5020

☒ Is further site investigation required?

Nine (9) temporary monitoring wells will be installed to delineate the lateral 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 November 7 and November 20, 2018, approximately 3,130 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.

Monitored natural attenuation (MNA) was selected as the remediation strategy for this site during the first quarter 2019 and continued through fourth quarter 2019. Enhanced fluid recovery (EFR) and air sparge (AS) activities were initiated in December 2019 and continue as the selected remediation strategy for the second quarter 2020.

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) _____ 3130
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
Yes _____ Air sparge / Soil vapor extraction
No _____ 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.

On January 23, 2019, nine monitoring wells (BH01 – BH09) were installed to delineate the extent of dissolved phase hydrocarbons associated with the release discovered on November 7, 2018. Groundwater samples will be submitted to Summit Scientific Laboratory for analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX) by USEPA Method 8260B. PDC will conduct quarterly groundwater monitoring at the nine (9) monitoring wells until closure criteria are met.

REMEDATION 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 3130

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

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Buffalo Ridge Waste Mangement Facility

Volume of E&P Waste (liquid) in barrels 5020

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

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: NGL Energy

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 areas were backfilled, compacted, and re-graded to math pre-existing conditions. The produced water vessel and associated production infrastructure were decommissioned following excavation activities. The former facility location will 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. 11/07/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/07/2018

Date of commencement of Site Investigation. 11/07/2018

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 11/07/2018

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: 03/31/2020

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: Candice (Nikki) Graber

Date: 04/02/2020

Remediation Project Number: 12170

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

402357340	FORM 27-SUPPLEMENTAL-SUBMITTED
402357438	MONITORING REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)