

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

05/01/2020

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11432Initial Form 27 Document #: 401662660

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 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>305592</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>STATE M-66N67W 36NESE</u>		Latitude: <u>40.442710</u>	Longitude: <u>-104.833300</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>36</u>	Twp: <u>6N</u>	Range: <u>67W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications GCMost Sensitive Adjacent Land Use crop landIs 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

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	see maps	sampling
Yes	SOILS	see maps	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.

After acquiring this location and remediation project from the previous operator, SRC decided that excavation and removal of the contaminated soil would be the quickest and most effective means of moving forward with site remediation and final reclamation of the location. On 5/10/18 and 5/11/18, SRC excavated an area approximately 60' x 90' to a depth of approximately 5-6', down to the top of the water table. Soil samples were collected from the 4 corners of the excavation at depth and tested for DRO, GRO, and BTEX. Groundwater samples were also collected from 5 locations within the excavation and tested for BTEX. The excavation was then backfilled with clean dirt hauled in and final reclamation of the location was completed

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):

No further soil sampling is planned

Proposed Groundwater Sampling

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

Quarterly groundwater monitoring of all 16 monitoring wells for BTEX the 3rd month of each quarter until 4 consecutive Table 910-1 compliant quarters are achieved.

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):

Quarterly groundwater monitoring of all 16 monitoring wells for BTEX the 3rd month of each quarter until 4 consecutive Table 910-1 compliant quarters are achieved.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 910-1

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

Approximate areal extent (square feet)

NA / ND

ND Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet)

Groundwater

Number of groundwater samples collected 16

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 5'

Number of groundwater monitoring wells installed 16

Number of groundwater samples exceeding 910-1 1

-- Highest concentration of Benzene (µg/l) 41.2

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 10.7

-- Highest concentration of Xylene (µg/l) 7.08

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)

Volume of liquid waste (barrels)

☒ Is further site investigation required?

Quarterly groundwater monitoring of all 16 monitoring wells for BTEX the 3rd month of each quarter until 4 consecutive Table 910-1 compliant quarters are achieved.

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 plug and abandonment activities conducted by SRC Energy, approximately 1,300 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility for disposal under SRC Energy waste manifests.

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.

Following source mass removal activities conducted by SRC Energy, Microblaze was applied to the groundwater within the excavation to address dissolved-phase hydrocarbon impacts. Mobile soil vapor extraction (SVE) and air sparge (AS) were initiated during the third quarter 2019 to address persisting dissolved-phase hydrocarbon concentrations. In April 2020, enhanced fluid recovery (EFR) and AS was initiated as the selected remediation strategy and will continue through 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) _____ 1300

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)

☐ _____ Chemical oxidation

Yes _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____ Enhanced fluid recovery (EFR)
/ Air sparge (AS)

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 November 6, 2019, 16 monitoring wells (BH10R, and BH11 - BH25) were installed to delineate dissolved-phase hydrocarbon impacts adjacent to and within the former excavation extent. Quarterly groundwater monitoring will continue at the 16 site monitoring wells using USEPA Method 8260B until closure criteria is achieved.

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? 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: _____

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? 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? No

Is additional groundwater monitoring to be conducted? Yes

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 was backfilled and re-graded to match pre-existing conditions. The facility was decommissioned and will be reclaimed in accordance with COGCC 1000 Series rules.

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? Yes

If NO, does the seed mix comply with local soil conservation district recommendations? Yes

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, if known. 10/05/2016

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/06/2016

Date of commencement of Site Investigation. 05/10/2018

Date of completion of Site Investigation. 01/17/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. 05/10/2018

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. 09/13/2018

Date of completion of Reclamation. 11/19/2018

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: 05/01/2020

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: 05/06/2020

Remediation Project Number: 11432

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

402386688	FORM 27-SUPPLEMENTAL-SUBMITTED
402387126	MONITORING REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)