

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402418799

Receive Date:

Report taken by:

## 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>	<b>Phone Numbers</b>
Address: <u>1775 SHERMAN STREET - STE 3000</u>		Phone: <u>(303) 850-5800</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 #: 13978 Initial Form 27 Document #: 402143603

#### 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 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>SPILL OR RELEASE</u>	Facility ID: <u>466613</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Warren McMillan 2 Historic Spill</u>		Latitude: <u>40.293236</u>	Longitude: <u>-104.711610</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>19</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 SM Most Sensitive Adjacent Land Use crop

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

Is 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	TBD	sampling
Yes	SOILS	160'x70	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.

During production facility demo and equipment removal, Unlimited Service's roustabout crew observed potential contamination near the separator dump line riser. The soil of concern was sampled and analyzed for BTEX, DRO, and GRO. Results were not within Table 910-1 limits. SRC and Unlimited are in the process of impacted soil extent determination and removal. Groundwater was encountered at approximately 8.5' below ground surface. A groundwater sample was collected and analyzed for BTEX. Those results were also not Table 910-1 compliant.

## 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 ):

During impacted soil removal operations, several sidewall soil samples were collected at depth around the perimeter of the excavation and analyzed for BTEX/DRO/GRO at Origins Laboratory in Denver. Impacted soil excavation figure, lab analytical reports, and data tables are submitted with this document.

### Proposed Groundwater Sampling

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

The initial array of 9 MWs on the proposed MW figure submitted with this document will be installed by Eagle Environmental. The MWs will be developed, sampled, and analyzed for BTEX at Origins Laboratory in Denver.

### 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 ):

If the extents of impacted groundwater are not defined with the initial 9 proposed MWs, SRC and Eagle will go ahead and move forward with installing additional MWs until groundwater impact extent is fully defined.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 22  
Number of soil samples exceeding 910-1 5  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 11200

### NA / ND

-- Highest concentration of TPH (mg/kg) 1277  
NA Highest concentration of SAR             
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 9

### Groundwater

Number of groundwater samples collected 1  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 9'  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 910-1 1

-- Highest concentration of Benzene (µg/l) 107  
-- Highest concentration of Toluene (µg/l) 11.1  
-- Highest concentration of Ethylbenzene (µg/l) 180  
-- Highest concentration of Xylene (µg/l) 667  
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) 1540      Volume of liquid waste (barrels) 1170

☒ Is further site investigation required?

impacted groundwater extent determination

# 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.

Well has been plugged and equipment removed.

## 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.

SRC and Unlimited removed approximately 1,540 yds of impacted soil and 1,170 bbls of impacted groundwater from the excavation. Clean dirt in the top 4 or so feet of the excavation was removed and stockpiled separately for backfill material, so that the impacted soil at depth could be reached and removed. Once perimeter sidewall soil samples confirmed all impacted material above the saturated zone had been removed, 500 lbs of carbon and 300 lbs of gypsum were applied to the excavation before backfill.

## 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) \_\_\_\_\_ 1540

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 )

Yes \_\_\_\_\_ Chemical oxidation

☐ \_\_\_\_\_ Air sparge / Soil vapor extraction

☐ \_\_\_\_\_ Natural Attenuation

Yes \_\_\_\_\_ Other \_\_\_\_\_ removal \_\_\_\_\_

## 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.

In December 2019 an initial array of 9 MWs were installed and in April 2020 two additional wells were installed. Both sets of wells were installed by Eagle Environmental. The MWs will be developed, sampled, and analyzed for BTEX at Origins Laboratory in Denver. The MWs will be sampled quarterly until 4 consecutive quarters of Table 910-1 compliant results has been 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? Yes \_\_\_\_\_

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

none

Volume of E&P Waste (solid) in cubic yards 1540

E&P waste (solid) description impacted soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: North Weld Landfill

Volume of E&P Waste (liquid) in barrels 1170

E&P waste (liquid) description impacted groundwater mixed with  
irrigation pivot water

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: CSI Bennett

## 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? No \_\_\_\_\_

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? No \_\_\_\_\_

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.

Site is to be reclaimed per 1000 series rules pending landowner consultation at the site. However, seeding won't take place until all necessary MWs have been installed to define POC.

Is the described reclamation complete? No \_\_\_\_\_

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. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). \_\_\_\_\_

Date of commencement of Site Investigation. 07/30/2019 \_\_\_\_\_

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**

This SF27 is to report 2Q20 groundwater monitoring results. Eagle's 2Q20 groundwater monitoring report is attached. During this quarter, two additional POC wells were installed, sampled and incorporated in the monitoring network.

Confirmation soil sampling near MW-3 will be conducted after four consecutive quarters of groundwater results exhibit concentrations below table 910-1 standards.

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

Signed: Karen Olson \_\_\_\_\_

Title: Snr. Program Manager \_\_\_\_\_

Submit Date: \_\_\_\_\_

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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 13978 \_\_\_\_\_

### **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**

402418805	MONITORING REPORT
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Total Attach: 1 Files

### **General Comments**

### **User Group**

### **Comment**

### **Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)