

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:

402427676

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>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Karen Olson</u>	Email: <u>COGCCSpillRemediation@pdce.com</u>	
		Phone: <u>(303) 860-5800</u>
		Mobile: <u>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**  
Remediation Project #: 15008 Initial Form 27 Document #: 402299094

**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>TANK BATTERY</u>	Facility ID: <u>437252</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Sitzman1&amp;32-4,French1,5,41-1</u>	Latitude: <u>40.431826</u>	Longitude: <u>-104.550872</u>	
	** correct Lat/Long if needed: Latitude: <u>40.431778</u>	Longitude: <u>-104.550441</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>4</u>	Twp: <u>5N</u>	Range: <u>64W</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 buildings are located approximately 283 feet west of the location. Livestock is located approximately 261 feet west of the location. FWS Wetlands are located approximately 317 east of the location. There are no CPW Sensitive Wildlife Habitats identified within a 1/4-mile radius.

# 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	Refer to Fig. 1A and Table 3	Implementation of site investigation plan
Yes	SOILS	Refer to Fig. 1A and Tables 1 & 2	Confirmation Soil 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 February 28, 2020, confirmation soil sampling was conducted below the produced water vessel during facility decommissioning at the French 5, 41-4, Sitzman 1 tank battery. No hydrocarbon impacts were discovered below the produced water vessel. However, a historic release was discovered on March 2, 2020, below the separator. Following the discovery, excavation activities were initiated and approximately 1,780 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 ):

On February 28, 2020, one soil sample (SS01) was collected below the former produced water vessel. Between March 2 and March 12, 2020, 39 soil samples (S01 - S39) were collected from the sidewalls and base of the excavation at depths ranging between 5 and 11 feet below ground surface (bgs). The soil samples were submitted to Summit Scientific Laboratories (Summit) for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by EPA Method 8260B, and TPH - diesel range organics (DRO) by EPA Method 8015. In addition, soil sample SS01 was submitted for laboratory analysis of electrical conductivity (EC) by EPA 120.1 and pH by EPA Method 9045D. Analytical results indicated that organic and inorganic compound concentrations were below the applicable COGCC Table 910-1 soil standards in the soil samples collected from the final excavation extent and below the former produced water vessel.

### **Proposed Groundwater Sampling**

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

During site investigation activities, groundwater was encountered at approximately 7.5 feet bgs. Following the completion of source mass removal activities, one groundwater sample (GW01) was collected from the excavation on March 12, 2020, and submitted to Summit for analysis of BTEX by EPA Method 8260. Analytical results indicated that BTEX concentrations were below the applicable COGCC Table 910-1 groundwater 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 ):

Eight (8) monitoring wells will be installed via direct-push drilling methods to confirm the absence of dissolved-phase hydrocarbon impacts within and surrounding the former excavation extent. Proposed monitoring well locations are illustrated on Figure 2.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 40  
Number of soil samples exceeding 910-1 2  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 5988

### NA / ND

-- Highest concentration of TPH (mg/kg) 3060  
NA Highest concentration of SAR           
BTEX > 910-1 No  
Vertical Extent > 910-1 (in feet) 11

### Groundwater

Number of groundwater samples collected 1  
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 0

ND Highest concentration of Benzene (µg/l)           
ND Highest concentration of Toluene (µg/l)           
-- Highest concentration of Ethylbenzene (µg/l) 1.5  
ND Highest concentration of Xylene (µg/l)           
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) 1780      Volume of liquid waste (barrels) 165

Is further site investigation required?

Eight (8) monitoring wells will be installed via direct-push drilling methods to confirm the absence of dissolved-phase hydrocarbon impacts within and surrounding the former excavation extent. 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 March 2 and March 12, 2020, approximately 1,780 cubic yards of impacted material were removed and transported to the North Weld Waste Management Facility for disposal. As previously described, confirmation soil samples collected from the final excavation extent indicated that unsaturated and saturated hydrocarbon impacted material was 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.

On April 28, 2020, eight (8) monitoring wells (BH01 - BH08) were installed to confirm the absence of dissolved-phase hydrocarbon impacts adjacent to and within the former excavation extent. Based on analytical results collected from the initial groundwater assessment conducted in the second quarter 2020, monitored natural attenuation (MNA) will be the selected remediation strategy for this location.

## Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

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

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 1780

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

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

On April 28, 2020, eight monitoring wells (BH01 - BH08) were installed to confirm the absence of dissolved-phase hydrocarbon impacts. PDC will continue quarterly groundwater monitoring at the eight monitoring well locations using EPA Method 8260B until closure criteria are 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:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 1780

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 165

E&P waste (liquid) description Impacted groundwater

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

Non-COGCC Disposal Facility: NGL Energy 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.

The excavation was backfilled and re-graded to match pre-existing conditions. The facility was decommissioned and will be reclaimed in accordance with the 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? \_\_\_\_\_

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. \_\_\_\_\_

## **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 02/05/2020

Date of commencement of Site Investigation. 02/28/2020

Date of completion of Site Investigation. 04/28/2020

## **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 03/02/2020

Date of completion of Remediation. \_\_\_\_\_

## **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

## **OPERATOR COMMENT**

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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: \_\_\_\_\_

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: 15008

## **COA Type**

## **Description**

<b><u>COA Type</u></b>	<b><u>Description</u></b>

## **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**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
402427679	MONITORING REPORT

Total Attach: 1 Files

## **General Comments**

### **User Group**

### **Comment**

### **Comment Date**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
		Stamp Upon Approval

Total: 0 comment(s)