

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

402445583

Date Received:

07/17/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

1 of 1 CAs from the FIR responded to on this Form

1 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 69175

Name of Operator: PDC ENERGY INC

Address: 1775 SHERMAN STREET - STE 3000

City: DENVER State: CO Zip: 80203

Contact Name and Telephone:

Name: \_\_\_\_\_

Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_

Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name

Phone

Email

Zack Liesenfeld

970-9506-9272

zack.liesenfeld@pdce.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 697600787

Inspection Date: 01/31/2020

FIR Submit Date: 02/03/2020

FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: PDC ENERGY INC

Company Number: 69175

Address: 1775 SHERMAN STREET - STE 3000

City: DENVER State: CO Zip: 80203

LOCATION - Location ID: 329819

Location Name: HSR-CULLEN ODENBAUGH-63N67W Number: 12NESW County: \_\_\_\_\_

Qtrqtr: NESW Sec: 12 Twp: 3N Range: 67W Meridian: 6

Latitude: 40.238044 Longitude: -104.841308

FACILITY - API Number: 05-123-00 Facility ID: 448329

Facility Name: MSW #1 Number: \_\_\_\_\_

Qtrqtr: NESW Sec: 12 Twp: 3N Range: 67W Meridian: 6

Latitude: 40.238044 Longitude: -104.841308

CORRECTIVE ACTIONS:

1  CA# 136294

Corrective Action: Submit plans for site investigation to document status of soils impacted by drill cuttings and water based mud at site. Provide final map or aerial image of area utilized for cuttings/mud disposal. Provide records of volume of material brought to site as required by policy.

Date: 03/04/2020

Response: CA COMPLETED

Date of Completion: 07/17/2020

Operator Comment: On November 20th, 2018 PDC stopped hauling water-based drill cuttings and fluids to the MSW #1 Spread Field. Area was deep ripped, and cuttings were incorporated into native material.

Soil analytics shows a few elevated levels of EC and Arsenic on the MSW #1 Spread Field. See attached map

and table for results. However, these elevated levels are consistence with other recent spread field closers and will be mitigated with time, proper cultivation and irrigation. Please note background sample data shows elevated arsenic levels before the field began receiving cuttings.

PDC has spoken with the landowner and have developed a plan to address elevated constituent levels outlined below.

MSW #1 spread field was planted with alfalfa and barley summer 2020. Southern 1/3 of field is under irrigation. Irrigation will continue throughout the 2020 growing season. The northern 2/3 of the field is dryland pasture. After the 2020 harvest landowner will work with PDC to develop a deep mechanical tillage treatment of the MSW #1 spread field. Tillage to be a minimum of 20" below ground surface to break up any compaction and increase infiltration. Increased infiltration will promote the leaching of EC and Arsenic from the soil profile. Consistence cultivation will also aid in decreasing EC and Arsenic levels. After deep mechanical tillage, soil samples will be collected, and alfalfa will be planted on the entire field spring of 2021. Field will be sampled again in the spring of 2021.

COGCC Decision: **Not Approved**

COGCC Representative: corrective action requirement of the inspection was to submit a site investigation and remediation plan to describe your investigation plan and results.  
This has not been done.

#### OPERATOR COMMENT AND SUBMITTAL

Comment:

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

Print Name: Zack Liesenfeld

Signed:

Title: EHS Rep

Date: 7/17/2020 8:51:35 AM

### **ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
402445583	FIR RESOLUTION SUBMITTED
402445587	Material Volumes
402445589	Sample Results - Table
402445590	Sample Results - Map
402445592	Location Map

Total Attach: 5 Files