

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: PDC ENERGY INC	Operator No: 69175	Phone Numbers
Address: 1775 SHERMAN STREET - STE 3000		Phone: (303) 860-5800
City: DENVER State: CO Zip: 80203		Mobile: ()
Contact Person: Karen Olson	Email: COGCCSpillRemediation@pdce.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 15038 Initial Form 27 Document #: 402301002

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: LOCATION	Facility ID: 302865	API #: _____	County Name: WELD
Facility Name: OSTER G-64N65W 30SWSE	Latitude: 40.279660	Longitude: -104.705930	
	** correct Lat/Long if needed: Latitude: 40.283257	Longitude: -104.700148	
QtrQtr: SWSE	Sec: 30	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Cropland/Residential

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

A riverine is located 180 feet to the northwest. An irrigation water well is located 1,150 feet to the northwest. A residence is located 820 feet to the east.

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 Figure 2 and Table 3	Groundwater Sampling
Yes	SOILS	Refer to Figure 2 and Table 1	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.

Historic hydrocarbon impacts were discovered below the produced water vessel during plug and abandonment activities at the Oster Molander 1 tank battery. Approximately 114 cubic yards of impacted material were excavated and transported off site to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests. A topographic map is included as Figure 1.

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):

A total of 11 soil samples (SS01 – SS11) were collected from the sidewalls and base of the excavation area at 3 feet, 5 feet, and 8 feet below ground surface (bgs). Soil samples were submitted to Summit Scientific (Summit) for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) – gasoline range organics (GRO) by EPA Method 8260B, TPH – diesel range organics (DRO) by EPA Method 8015. In addition, the soil sample (SS01) collected below the former vessel was submitted for analysis of pH by EPA Method 9045D and electrical conductivity (EC) by EPA Method 120.1. Analytical results indicated that constituent concentrations were below COGCC Table 910-1 standards in the soil samples collected from the final excavation extent. Soil analytical data is summarized in Tables 1 and 2. The excavation extent and sample locations are illustrated on Figure 2.

Proposed Groundwater Sampling

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

Groundwater was encountered in the excavation area at approximately 8.5 feet bgs. One groundwater sample (GW01) was collected from the excavation area prior to any vacuum recovery and submitted to Summit for analysis of BTEX by EPA Method 8260B. Analytical results indicated that the benzene concentration was in exceedance of the COGCC Table 910-1 standard. Groundwater analytical results are summarized in Table 3.

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):

A groundwater assessment will be conducted to determine the extent of remaining dissolved-phase hydrocarbon impacts on site.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 11
Number of soil samples exceeding 910-1 3
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 875

NA / ND

-- Highest concentration of TPH (mg/kg) 2040
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 8

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 8'
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 910-1 1

-- Highest concentration of Benzene (µg/l) 100
ND Highest concentration of Toluene (µg/l)
-- Highest concentration of Ethylbenzene (µg/l) 25
-- Highest concentration of Xylene (µg/l) 110
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) 114 Volume of liquid waste (barrels) 0

Is further site investigation required?

Five monitoring wells will be installed within and surrounding the former excavation area to delineate the extent of remaining groundwater impacts. Proposed well locations are illustrated on Figure 3.

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.

Approximately 114 cubic yards of impacted material were excavated and transported off site to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests. Analytical data collected from the final excavation area indicated that hydrocarbon soil impacts were successfully removed during 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 June 18, 2020, six monitoring wells (BH06 – BH11) were installed to delineate the lateral extent of hydrocarbon impacts and establish down-gradient point of compliance. Based on the analytical results collected during the supplemental site investigation and third quarter 2020 groundwater monitoring event, monitored natural attenuation (MNA) will continue as the selected remediation strategy through the fourth quarter 2020.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 114

_____ 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 June 18, 2020, six monitoring wells (BH06 – BH11) were installed to delineate the lateral extent of hydrocarbon impacts and establish down-gradient point of compliance. PDC will continue quarterly groundwater monitoring at the 11 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 _____ 114

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: North Weld Waste Management Facility

Volume of E&P Waste (liquid) in barrels _____ 0

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? _____

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 facility was decommissioned and will not be replaced. The location 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? _____

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. 06/17/2020

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/03/2020

Date of commencement of Site Investigation. 02/12/2020

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/13/2020

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: 08/31/2020

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: 09/02/2020

Remediation Project Number: 15038

COA Type

Description

	Soil analytical results collected during monitoring well installation activities indicated that the TPH concentration in borehole BH03 was above the applicable COGCC Table 910-1 soil standard. Operator shall addresss these impacts in future Form 27 Supplemental Reports. Soil samples will be required prior to closure.
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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

402477688	FORM 27-SUPPLEMENTAL-SUBMITTED
402477700	MONITORING REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)