

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402577938

Receive Date:

01/27/2021

Report taken by:

RICK ALLISON

## Site Investigation and Remediation Workplan (Initial 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) 860-5800</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 #: 16574Initial Form 27 Document #: 402577938

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input 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 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 checked="" type="checkbox"/> Other <u>Wellhead Closure</u>  |

#### SITE INFORMATION

N Multiple Facilities ( in accordance with Rule 909.c. )

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-23073</u>	County Name: <u>WELD</u>
Facility Name: <u>HOWARD LAKE 21-9</u>		Latitude: <u>40.505750</u>	Longitude: <u>-104.557780</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>64W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use AgricultureIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? No

#### Other Potential Receptors within 1/4 mile

No domestic water wells are located within a ¼ mile radius of the location. The Eaton Ditch is located approximately 1,445 feet west of the location. Occupied housing is located approximately 701 feet northeast of the location. FWS wetlands designated as riverine habitat are located approximately 1,445 feet west of the location. There are no High Priority Habitats located within a ¼ mile radius of the location. Livestock are located approximately 787 feet northeast of the location.

# 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
UNDETERMINED	SOILS	TBD	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.

In accordance with COGCC Rule 911, this form serves as notification for decommissioning and/or abandonment of the production facility or the off-location wellhead and flowline. The ground and sub-surfaces will be visually inspected for hydrocarbon impacts during equipment decommissioning. Field observations and photo documentation will be recorded in a field inspection form for submittal to the COGCC.

## 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 ):

Grab soil samples will be collected below and/or adjacent to applicable facility equipment, as defined in the Rule 911.a.(4) guidance document (1/4/21), for field screening purposes. Discrete soil samples will be collected for laboratory analysis either in any area of observed hydrocarbon impacts, or in the sample locations designated by the COGCC. GPS data will be collected for all soil sample locations. Soil samples will be submitted for laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH C6-C36) by EPA Methods 8260B and 8015. Additionally, soil sample(s) will be collected in the area most likely to be impacted by produced water to confirm soil suitability for reclamation. The sample(s) will be submitted for laboratory analysis of electrical conductivity (EC), pH, sodium adsorption ratio (SAR), and boron by saturated paste and hot water soluble extraction methods. Refer to the Proposed Sample Location Map.

### Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

### 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 ):

During the abandonment of any off-location flowlines, an assessment will be conducted at the terminal ends of the flowline. Soils will be field screened below the flowline and if suspected impacts are observed, a soil sample will be submitted for laboratory analysis of BTEX and TPH (C6-C36) by EPA Methods 8260B and 8015. GPS data and photo documentation will be recorded for each inspection/sample location. A map illustrating the flowline assessment will be provided in the Supplemental Form 27.

# 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? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_

### NA / ND

\_\_\_\_\_ Highest concentration of TPH (mg/kg) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of SAR \_\_\_\_\_  
\_\_\_\_\_ BTEX > 910-1 \_\_\_\_\_  
\_\_\_\_\_ Vertical Extent > 910-1 (in feet) \_\_\_\_\_

### Groundwater

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

\_\_\_\_\_ Highest concentration of Benzene (µg/l) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of Toluene (µg/l) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of Xylene (µg/l) \_\_\_\_\_  
\_\_\_\_\_ 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?

# REMEDIAL ACTION PLAN

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Any hydrocarbon impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

## 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.

If reportable hydrocarbon impacts, as defined in Rule 912.b., are discovered, a site-specific remediation plan will be developed and submitted via a Supplemental Form 27. If reportable impacts are not encountered, a Supplemental Form 27 closure request will be submitted within 45 days of abandonment and/or decommissioning activities.

## Soil Remediation Summary

### ☐ In Situ

- ☐ Bioremediation ( or enhanced bioremediation )
- ☐ Chemical oxidation
- ☐ Air sparge / Soil vapor extraction
- ☐ Natural Attenuation
- ☐ Other \_\_\_\_\_

### ☐ Ex Situ

- ☐ Excavate and offsite disposal
- ☐ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_
- ☐ 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 )
- ☐ Chemical oxidation
- ☐ Air sparge / Soil vapor extraction
- ☐ 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.

## 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? \_\_\_\_\_

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: \_\_\_\_\_

## 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.

Reclamation will be conducted in accordance with COGCC 1004 Series Rules.

Is the described reclamation complete? \_\_\_\_\_

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. 10/16/2020

Actual Spill or Release date, if known. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/21/2021

Date of commencement of Site Investigation. \_\_\_\_\_

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 Form 27 serves as notification for the abandonment of the Howard Lake 21-9 Wellhead and associated flowline that will be left in place. Abandonment activities are planned to begin the week of January 21, 2021. This schedule may be adjusted due to unforeseen circumstances, delays, and/or changes in weather. Applicable Form 42/44 document number: 402583514.

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: ` 01/27/2021 \_\_\_\_\_

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: RICK ALLISON \_\_\_\_\_

Date: 02/05/2021 \_\_\_\_\_

Remediation Project Number: 16574 \_\_\_\_\_

**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**

402577938	FORM 27-INITIAL-SUBMITTED
402584777	SITE INVESTIGATION PLAN

Total Attach: 2 Files

Data retrieval failed for the subreport, 'Comments', located at: \\DNRWBP004\efFormReports\General\_Cmt.rdlc. Please check