

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
CHRIS CANFIELD

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>	Phone Numbers
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>		Mobile: <u>()</u>
Contact Person: <u>Karen Olson</u>	Email: <u>COGCCSpillRemediation@pdce.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 10032 Initial Form 27 Document #: 401186555

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 checked="" 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>FLOWLINE</u>	Facility ID: <u>328514</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>STRUCK-61N67W 36NWNE</u>	Latitude: <u>40.013189</u>	Longitude: <u>-104.837890</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>36</u>	Twp: <u>1N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Agriculture/Livestock

Is domestic water well within 1/4 mile? Yes 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

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 type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" 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	TBD	Lab results of groundwater samples from excavation and monitoring wells
Yes	SOILS	Approximately 18'x21'x8.5'	PID readings and field observation while performing source removal excavation.

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 December 27, 2016, following discovery of the release, the site was shut-in and locked out. The separator was removed and the area immediately below the separator was excavated. To determine the extent of impact to soil, on January 5, 2017, LTE advanced four soil borings (SB01 through SB03, and SB05) in cardinal directions of the excavation and one soil boring at the southeastern edge of the excavation (SB04). All soil borings were completed as 1-inch PVC monitoring wells with total depths ranging from 15 to 16 feet below ground surface with 10 feet of screen. One grab soil sample was collected from each soil boring above the water table from the interval exhibiting the highest PID reading for analysis of BTEX and TPH. Analytical results of the soil samples collected from the soil borings were in compliance with applicable COGCC Table 910-1 standards.

On January 13, 2017, additional excavation activities were conducted. Upon completion, LTE collected four grab soil samples (SS08 through SS11) from each sidewall of the excavation for analysis of BTEX and TPH. Analytical results indicated compliance with applicable COGCC Table 910-1 standards. Groundwater was encountered at the base of the excavation at approximately 10 feet below grade and free product was observed. One grab sample of the groundwater (GW01) was collected for analysis of BTEX. Laboratory analytical results indicated that groundwater sample GW01 was in exceedance of the COGCC Table 910-1 standards for benzene, toluene, and total xylenes.

On January 13, 2017, groundwater samples were collected from four monitoring wells (SB01 through SB03, and SB05) and analyzed for BTEX. Free product was present in groundwater monitoring wells SB01, SB02, and SB04. Analytical results indicated that the groundwater samples collected from monitoring wells SB01 and SB02 exceeded the COGCC Table 910-1 standards for benzene, toluene, and total xylenes.

Site maps and analytical results are attached.

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):

Soil samples were collected from the sidewalls of the excavation and from soil borings SB01 through SB05. Additional soil samples may be collected as part of additional site delineation.

Proposed Groundwater Sampling

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

Groundwater monitoring wells will be sampled quarterly for analysis of BTEX. There are currently five groundwater monitoring wells at the site, however, the full extent of groundwater impact is not yet delineated. Additional groundwater monitoring wells will be installed on January 19, 2017. The locations of the groundwater monitoring wells currently at the site are presented on Figure 2.

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):

On January 19, 2017, additional monitoring wells will be installed to establish points of compliance and delineate the extent of petroleum hydrocarbon impact to groundwater at the site. Remediation activities to be determined.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 9
Number of soil samples exceeding 910-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 335

NA / ND

-- Highest concentration of TPH (mg/kg) 312
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 8

Groundwater

Number of groundwater samples collected 6
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 10'
Number of groundwater monitoring wells installed 5
Number of groundwater samples exceeding 910-1 3

-- Highest concentration of Benzene (µg/l) 1060
-- Highest concentration of Toluene (µg/l) 4000
-- Highest concentration of Ethylbenzene (µg/l) 222
-- Highest concentration of Xylene (µg/l) 3920
NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected
0 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) 46 Volume of liquid waste (barrels) 0

Is further site investigation required?

Additional site investigation will be conducted to establish point of compliance groundwater monitoring wells and delineate the extent of petroleum hydrocarbon impacts in groundwater. Remediation activities are to be determined.

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.

Impacted soil has been excavated and transported to Front Range Landfill in Erie, Colorado, for disposal.

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.

Remediation plan will be developed following additional site investigation activities to delineate the extent of impacted groundwater.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 46

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

No _____ 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

_____ 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.

Additional monitoring wells will be installed at the site until points of compliance are established to delineate the extent of groundwater impact at the site. Groundwater wells will be sampled quarterly for analysis of BTEX until compliance with applicable COGCC Table 910-1 standards is 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:

Transported to disposal facility.

Volume of E&P Waste (solid) in cubic yards _____ 46

E&P waste (solid) description Hydrocarbon impacted soil _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Connections Front Range
Landfill at Erie, Colorado

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? Yes _____

Do all soils meet Table 910-1 standards? Yes _____

Does the previous reply indicate consideration of background concentrations? No _____

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? Yes _____

Is additional groundwater monitoring to be conducted? No _____

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.

To be determined. Final reclamation will be conducted as part of plug and abandonment activities.

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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/27/2016

Date of commencement of Site Investigation. 12/27/2016

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 01/13/2017

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Per the field inspection (Doc#689501069) completed on June 16, 2020 by the COGCC, PDC Energy is requesting a No Further Action (NFA) determination for this location. Remediation and confirmation sampling activities for this location was approved under Remediation No. 11178 (Doc#402098866).

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: 04/07/2021

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: CHRIS CANFIELD

Date: 04/07/2021

Remediation Project Number: 10032

Condition of Approval**COA Type****Description**

	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.
	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
2 COAs	

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**

402646476	FORM 27-SUPPLEMENTAL-SUBMITTED
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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)