

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402728489

Date Received:

06/25/2021

Spill report taken by:

Graber, Candice
(Nikki)

Spill/Release Point ID:

480195

SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 906.b. for reporting requirements of spills or releases of E&P Waste or produced fluids. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

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) 597-6847</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		Mobile: <u>()</u>
Contact Person: <u>Phillip Porter</u>		Email: <u>COGCCSpillRemediation@pdce.com</u>

Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 402722789

Initial Report Date: 06/18/2021 Date of Discovery: 03/25/2021 Spill Type: Historical Release

Spill/Release Point Location:

QTRQTR SESW SEC 33 TWP 4N RNG 66W MERIDIAN 6

Latitude: 40.262172 Longitude: -104.784086

Municipality (if within municipal boundaries): _____ County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

Reference Location:

Facility Type: WELL Facility/Location ID No _____

Spill/Release Point Name: Tanner K 33-14 Well API No. (Only if the reference facility is well) 05-123-15132

No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): Unknown Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): 0

Estimated Other E&P Waste Spill Volume(bbl): 0 Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: _____

Has the subject Spill/Release been controlled at the time of reporting? Yes

Land Use:

Current Land Use: CROP LAND Other(Specify): _____

Weather Condition: Sunny and hot

Surface Owner: FEE Other(Specify): _____

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

PDC discovered a historical reportable spill while abandoning the well head at the Tanner K 33-14. At the request of the surface owner, supplemental site investigation will be completed after crop harvest.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

<u>Date</u>	<u>Agency/Party</u>	<u>Contact</u>	<u>Phone</u>	<u>Response</u>
6/17/2021	COGCC	Nikki Graber	-	Via Email
6/17/2021	Land Owner	NA	-	Via Phone Call
6/18/2021	Weld County		-	

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

No Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: _____ Public Water System: _____

Residence or Occupied Structure: _____ Livestock: _____

Wildlife: _____ Publicly-Maintained Road: _____

No Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery _____ (HH:MM)

Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 _____

Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? _____

Enter the Document Number of the Initial Accident Report, Form 22 _____

Was there damage during excavation? _____

Was CO 811 notified prior to excavation? _____

No Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): _____

No Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:

- The presence of free product or hydrocarbon sheen Surface Water
- The presence of free product or hydrocarbon sheen on Groundwater
- The presence of contaminated soil in contact with Groundwater
- The presence of contaminated soil in contact with Surface water

Yes	Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylight from the subsurface.
No	Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property. <input type="checkbox"/> Areas offsite of Oil & Gas Location <input type="checkbox"/> Off-Location Flowline right of way
No	Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.
No	Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

SPILL/RELEASE DETAIL REPORTS

#1	Supplemental Report Date: <u>06/24/2021</u>		
FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	_____	<input checked="" type="checkbox"/>
CONDENSATE	<u>0</u>	<u>0</u>	<input type="checkbox"/>
PRODUCED WATER	<u>0</u>	<u>0</u>	<input type="checkbox"/>
DRILLING FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
FLOW BACK FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
OTHER E&P WASTE	<u>0</u>	<u>0</u>	<input type="checkbox"/>
specify: _____			
Was spill/release completely contained within berms or secondary containment? <u>NO</u> Was an Emergency Pit constructed? <u>NO</u>			
<i>Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.</i>			
A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit			
Impacted Media (Check all that apply) <input checked="" type="checkbox"/> Soil <input type="checkbox"/> Groundwater <input type="checkbox"/> Surface Water <input type="checkbox"/> Dry Drainage Feature			
Surface Area Impacted: Length of Impact (feet): <u>17</u>		Width of Impact (feet): <u>20</u>	
Depth of Impact (feet BGS): <u>3</u>		Depth of Impact (inches BGS): _____	
How was extent determined?			
<p>On March 25, 2021, a historic release was discovered following decommissioning activities at the Tanner K 33-14 Wellhead and associated flowline. Per the approved proposed soil sampling plan, two soil samples (FLR01 and WH01) were collected at approximately 2.5 feet and 3 feet below ground surface (bgs) from undisturbed areas most likely to be impacted by oil and gas operations located adjacent to and below production infrastructure. Soil sample FLR01 was submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, and TPH (C6-C36) and sample WH01 was submitted for analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), and boron. Analytical results indicated that the 1,3,5-TMB concentration was in exceedance of the COGCC Table 915-1 standard in soil sample FLR01. Analytical results are summarized in Tables 1 & 2. GPS coordinates and field screened VOC readings collected during excavation activities are summarized in Table 3. A topographic map is attached as Figure 1. Field screening and laboratory sample locations collected at the wellhead and along the flowline are illustrated on Figures 2 and 3. Laboratory reports are included in Attachment A and the excavation and wellhead decommissioning field notes and photo logs are included in Attachment B.</p>			
Soil/Geology Description:			
Vona loamy sand, 0 to 3 percent slopes			
Depth to Groundwater (feet BGS) <u>6</u>		Number Water Wells within 1/2 mile radius: <u>74</u>	
If less than 1 mile, distance in feet to nearest		Water Well <u>240</u> None <input type="checkbox"/>	Surface Water <u>588</u> None <input type="checkbox"/>
		Wetlands <u>588</u> None <input type="checkbox"/>	Springs _____ None <input checked="" type="checkbox"/>
		Livestock <u>525</u> None <input type="checkbox"/>	Occupied Building <u>905</u> None <input type="checkbox"/>
Additional Spill Details Not Provided Above:			

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 06/24/2021

Root Cause of Spill/Release Unknown (Historical)

Other (specify) _____

Type of Equipment at Point of Spill/Release: Wellhead Line

If "Other" selected above, specify or describe here:

Describe Incident & Root Cause (include specific equipment and point of failure)

On March 25, 2021, a historic release was discovered below the flowline riser during wellhead decommissioning activities. Due to the historic nature of the release, a root cause was not identified.

Describe measures taken to prevent the problem(s) from reoccurring:

The wellhead and associated flowline were removed and will not be replaced. In addition, PDC and the third-party consultant will review COGCC Rule 912 regarding spill release reporting requirements for hydrocarbon impacts within soil and groundwater. PDC will update our internal spill reporting procedures.

Volume of Soil Excavated (cubic yards): 0

Disposition of Excavated Soil (attach documentation) Offsite Disposal Onsite Treatment
 Other (specify) _____

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbls): 0

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure: Corrective Actions Completed (documentation attached, check all that apply)

Horizontal and Vertical extents of impacts have been delineated.

Documentation of compliance with Table 915-1 is attached.

All E&P Waste has been properly treated or disposed.

Work proceeding under an approved Form 27 (Rule 912.c).

Form 27 Remediation Project No: 16726

SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

OPERATOR COMMENTS:

Per discussion with the COGCC, a supplemental site investigation will be conducted at this location to assess hydrocarbon impacts beneath the former flowline riser. One sample will be collected from undisturbed native material below the former failed sample and submitted for laboratory analysis of TPH (C6-C36), Table 915-1 Organic Compounds in Soil, and Table 915-1 Soil Suitability for Reclamation. A proposed site investigation map is included as Figure 4. The site investigation will be conducted within 30 days of approval of this Supplemental Form 19.

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

Signed: _____ Print Name: Phillip Porter

Title: Snr. Env. Rep. Date: 06/25/2021 Email: COGCCSpillRemediation@pdce.com

Condition of Approval

<u>COA Type</u>	<u>Description</u>
	The lateral and vertical extent of impact shall be determined with appropriate confirmation soil sampling, more than the one proposed monitoring well will be required.
	Operator shall notify COGCC EPS personnel no less than 72 hours prior to installation of monitoring wells.
	Form 6 Document #402598885 submitted for the TANNER K #33-14 abandonment states the well was cut and capped at 6 feet below the ground surface. Therefore, additional confirmation soil samples should be collected from native soil adjacent the well at least 6 to 7 feet below ground surface.
	Operator shall provide an updated Form 27 for Remediation #16033 indicating groundwater monitoring and soil sampling plan in compliance with Table 915-1 within 30 days of approval of this Form 19 and prior to installation of monitoring wells.
	Operator will collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil , Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
	Due to the presence of shallow groundwater Operator shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.
6 COAs	

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
402728489	SPILL/RELEASE REPORT(SUPPLEMENTAL)
402728494	TOPOGRAPHIC MAP
402729613	SOIL SAMPLE LOCATION MAP
402729686	ANALYTICAL RESULTS
402729977	SITE INVESTIGATION PLAN
402729978	SOIL SAMPLE LOCATION MAP
402729990	PHOTO DOCUMENTATION
402734372	FORM 19 SUBMITTED

Total Attach: 8 Files

General Comments

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

Total: 0 comment(s)