

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: DCP OPERATING COMPANY LP	Operator No: 4680	Phone Numbers
Address: 370 17TH STREET - SUITE 2500		Phone: (303) 605-1718
City: DENVER State: CO Zip: 80202		Mobile: (303) 619-3042
Contact Person: Steve Weathers	Email: swweathers@dcpmidstream.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 14576 Initial Form 27 Document #: 402209246

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: 3Q21 groundwater progress and closure request under Table 910

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 465242	API #:	County Name: WELD
Facility Name: South Booster 6" pipeline Release	Latitude: 40.036780	Longitude: -104.467359	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NESW	Sec: 20	Twp: 1N	Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Cropland

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

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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
No	GROUNDWATER	Refer to attached Figure 4 Table 2	Groundwater sampling and Lab analysis

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Initial actions and completed remedial measures have previously been submitted to the COGCC in the Form 19 Initial (Document #402078486) dated June 18, 2019, Form 19 Supplemental (Document #402083619) dated June 21, 2019. A Form 27 Site Investigation and Remediation Work Plan (#402209246) was approved by COGCC on November 11, 2019. The COGCC issued a spill tracking facility ID #465242 and remediation project #14576 for the Site. During excavation activities, groundwater infiltrated the excavation at 12-feet below ground surface (bgs) and was sampled for BTEX constituents (Sample ID: GW01). Lab results confirmed groundwater was above COGCC standards for benzene, and that further groundwater investigation was required. The excavation was backfilled to existing grade and five monitoring wells were installed at the Site on August 8, 2019, to further evaluate groundwater conditions. Ongoing groundwater monitoring will be performed at the Site on a quarterly basis until a no further action (NFA) determination is approved by COGCC. Previous activities are summarized in subsequent Form 27 Supplemental report with the most recently approved 2Q21 F27S (#402697415) reports. Details of the Third Quarter 2021 groundwater monitoring event are provided within this Form 27 submittal.

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):

As presented in the supplemental Form 19 (#402083619), soil samples collected from the sidewalls and base of the final excavation extents to confirm impacted soils had been removed. Soil samples were submitted to Origins Laboratory in Denver, CO for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbons gasoline range organics (TPH-GRO) and TPH diesel range organics (DRO). The analytical lab reports were included with Form 19S (#402083619) submittal. The COGCC issued spill tracking ID #465242 and remediation project #14576. Further soil sampling or investigation is not anticipated at the Site.

Proposed Groundwater Sampling

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

With landowner approval, DCP installed five groundwater monitoring wells at the Site to monitor dissolved phase hydrocarbon impacts to groundwater. Ongoing quarterly groundwater monitoring is being performed at the Site at well locations illustrated on the attached Figure 2. Groundwater samples are being analyzed for the Table 910-1 constituents (BTEX) using USEPA Method 8260B per the approved F27S (#402262957). Analytical results from the 3Q21 sampling event are presented herein. Groundwater monitoring will continue on a quarterly basis until analytical results demonstrate concentrations below COGCC standards for four consecutive quarterly monitoring events, at which time a no further action (NFA) determination for the Site will be requested from the COGCC.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1200

NA / ND

NA Highest concentration of TPH (mg/kg) _____
NA Highest concentration of SAR _____
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) _____

Groundwater

Number of groundwater samples collected 5
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 12'
Number of groundwater monitoring wells installed 5
Number of groundwater samples exceeding 915-1 0

-- Highest concentration of Benzene (µg/l) 1.08
-- Highest concentration of Toluene (µg/l) 9.33
-- Highest concentration of Ethylbenzene (µg/l) 6.72
-- Highest concentration of Xylene (µg/l) 261
NA Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
0 Number of surface water samples exceeding 915-1
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?

DCP does not anticipate to complete additional soil or groundwater delineation activities at this time and will continue quarterly groundwater monitoring activities at the five existing monitoring well locations until a NFA determination is approved. The current quarter marks the fourth consecutive quarter of Table 910-1 compliance, and NFA closure is being requested in this Form 27.

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.

As previously reported in the Form 19S (#402083619) initial source remediation efforts, performed between June 17, 2019 and June 19, 2019, successfully removed approximately 410 cubic yards (CY) of impacted soils and 1-5 barrels of liquid for off-Site disposal. During excavation activities, groundwater infiltrated the excavation at 12-feet bgs and was sampled for BTEX constituents (Sample ID: GW01). Lab results confirmed groundwater was above COGCC standards for benzene, and that further groundwater investigation was required. The excavation was backfilled to existing grade and monitoring well installation activities were completed.

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.

As previously reported in the Form 19S (#402083619), completed remediation efforts successfully removed impacted soils associated with the Site. Following backfilling of the excavation, five groundwater monitoring wells were installed at the locations illustrated on the attached Figure 2. Third quarter 2021 groundwater monitoring was completed on August 4, 2021, and ongoing quarterly groundwater monitoring is scheduled to be performed at the Site and will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below COGCC Table 910-1 standards. The current quarter marks the fourth consecutive quarter of Table 910-1 compliance, and NFA closure is being requested in this Form 27. Activities completed during the third quarter 2021 groundwater monitoring event are further described in the following Groundwater Monitoring section.

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

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
No _____ 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.

Site-wide groundwater sampling is conducted on a quarterly basis at the five monitoring well locations illustrated on the attached Figure 2. During the 3Q21 monitoring event, performed on 8/4/2021, groundwater levels and samples were collected from all five Site-wide well locations using standard hand-bailing sampling methods, and were submitted to Origins Laboratory Inc. (Origins) for BTEX analysis using USEPA method 8260B. Groundwater levels and converted elevations are summarized on Table 1, and a groundwater elevation contour map is attached as Figure 3. The 3Q21 laboratory analytical data is summarized in Tables 2 and 3 and illustrated on Figure 4, and the laboratory reports are attached. With COGCC approval, DCP has continued to comply with the Table 910-1 standards per Rule 915.f within the new Environmental Impact Prevention 900 Series. Constituents not associated with Table 910-1 – 1,2,4-TMB; 1,35-TMB; and naphthalene – were analyzed outside of the site-specific sampling plan during the third quarter 2021, and the data for these constituents are presented within this Form 27. However, based on verbal approval by the COGCC on 8/16/21 and the approved F27S (#402626957), since Site closure is planned to occur prior to January 15, 2022 under Table 910-1 standards the additional constituents would not be considered for no further action approval. This quarter marks the fourth consecutive quarter of Table 910-1 compliance, and NFA closure is being requested in this Form 27.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

Request Alternative Reporting Schedule:

Semi-Annually Annually Other _____

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

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: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes _____

If YES:

Compliant with Rule 913.h.(1).

Compliant with Rule 913.h.(2).

Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? Yes _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes _____

Is additional groundwater monitoring to be conducted? No _____

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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 area where the excavation was located has been backfilled, compacted with clean material, and completed to existing grade. Following a NFA determination, monitoring wells will be removed and area will be re-graded per landowner approval.

Is the described reclamation complete? No _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/17/2019

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

Based on COGCC approval of the first quarter 2021 Form 27S (Document #402626957) to comply with the Table 910-1 groundwater standards since the site is anticipating closure before January 15, 2022, this site has achieved four consecutive quarters of groundwater concentrations below the COGCC Table 910-1 standards. Based on discussions and verbal approval from the COGCC on 8/16/21, constituents analyzed during the current quarter that are not regulated under Table 910-1 would not be considered as factors for Site closure, and DCP is submitting a request for no further action (NFA) in this Form 27S.

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

Signed: Steve Weathers _____

Title: Environmental Specialist _____

Submit Date: _____

Email: COGCCnotification@dcpmidstream.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: _____

Date: _____

Remediation Project Number: 14576 _____

COA Type**Description**

COA Type	Description

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**

Att Doc Num	Name
402786141	OTHER

Total Attach: 1 Files

General Comments**User Group****Comment****Comment Date**

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)