

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

12/01/2021

Report taken by:

RICK ALLISON

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19632 Initial Form 27 Document #: 402756094

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: _____

SITE INFORMATION

☐ Yes ☐ Multiple Facilities

| | | | |
|------------------------------------|----------------------------|---|---|
| Facility Type: <u>LOCATION</u> | Facility ID: <u>429667</u> | API #: _____ | County Name: <u>WELD</u> |
| Facility Name: <u>HOLTON 24-12</u> | | Latitude: <u>40.493820</u> | Longitude: <u>-104.611790</u> |
| | | ** correct Lat/Long if needed: Latitude: <u>40.493506</u> | Longitude: <u>-104.612169</u> |
| QtrQtr: <u>SESW</u> | Sec: <u>12</u> | Twp: <u>6N</u> | Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |
| Facility Type: <u>WELL</u> | Facility ID: _____ | API #: <u>123-35860</u> | County Name: <u>WELD</u> |
| Facility Name: <u>HOLTON 24-12</u> | | Latitude: <u>40.493820</u> | Longitude: <u>-104.612060</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>SESW</u> | Sec: <u>12</u> | Twp: <u>6N</u> | Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Agriculture

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

Tank Battery: Nearest Well: Domestic - 701 feet E, Surface Water: Livestock Pond - 258 feet SW, Occupied Buildings: 464 feet SW, Livestock: 447 feet NE, FWS Wetlands: Freshwater Emergent Wetland (PEM1F) - 995 feet NW, HPH: Aquatic Native Species Conservation Waters - 1,580 feet SE

Wellhead: Nearest Well: Domestic - 680 feet E, Surface Water: Livestock Pond - 346 feet SW, Occupied Buildings: 542 feet SW, Livestock: 414 feet NE, FWS Wetlands: Freshwater Emergent Wetland (PEM1F) - 912 feet NW, HPH: Aquatic Native Species Conservation Waters - 1,690 feet SE

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 |
|-----------|----------------|-------------------------------------|----------------------------|
| Yes | SOILS | Refer to Tables 1-4 and Figures 1&2 | 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 the decommissioning and abandonment of the Holton 24-12 production facility, Holton 24-12 Wellhead, and removal of the associated on-location 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 collected at the tank battery and wellhead will be submitted for laboratory analysis of BTEX, naphthalene, TPH (C6-C36), 1,2,4-TMB, and 1,3,5-TMB by EPA Methods 8260B and 8015. Additionally, soil sample(s) will be collected in the area most likely to be impacted by produced water and will be submitted for laboratory analysis of EC, pH, SAR, and boron by saturated paste and hot water soluble extraction methods.

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):

If a produced water vessel is present, discrete soil samples will be collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. The soil samples will be submitted for additional laboratory analysis of EC, pH, SAR, and boron by saturated paste and hot water soluble extraction methods. Assessments will be conducted during the removal of this off-location flowline (estimated to be 130 feet in length). Additional assessments will be conducted in the areas where the flowline is in close proximity to sensitive areas. The flowline and adjacent sub-surface will be inspected for any visual and olfactory indicators of potential failure and hydrocarbon impacts. Soils will be field screened below the flowline and if suspected impacts are observed, a soil sample will be submitted for lab analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, and TPH (C6-C36) by EPA Methods 8260B and 8015.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 11

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 100

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 1

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 915-1 1

Surface Water

0 Number of surface water samples collected

Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 0.075
5

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

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)

OTHER INVESTIGATION INFORMATION☐ Were impacts to adjacent property or offsite impacts identified?☒ Were background samples collected as part of this site investigation?

On September 2, 2021, three background samples (BKG01 @2.5', 4' and 6') were collected from native material topographically up-gradient of the wellhead and tank battery location and submitted for analysis of pH. Analytical results indicated that pH was in compliance with the applicable Table 915-1 standard in native material.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 5

Volume of liquid waste (barrels) 0

☐ Is further site investigation required?**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.

During tank battery decommissioning activities, approximately 5 cubic yards were removed below the separator dump line due to elevated field screened VOC readings. The material was transported to the North Weld Waste Management Facility for disposal under PDC waste manifests.

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.

Soil encountered adjacent to and surrounding the wellhead, below the flowline riser, and below production equipment was visually inspected and field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Two soil samples (WH01 and FLR01) were collected at approximately 4 feet and 6 feet below ground surface (bgs) from native material below the flowline riser and adjacent to the cut and capped well casing. In addition, samples were collected adjacent to the above ground storage tank (AST), separator flowline and dump line (SEP-FL and SEP-DL), and produced water vessel (PWV). During decommissioning activities, 5 CY were removed from below the separator dump line. Soil samples WH01 and FLR01 were submitted for laboratory analysis of the COGCC Table 915-1 Organic Compounds in Soil, and TPH (C6-C36). Per the approved proposed soil sampling plan, the tank battery samples were submitted for laboratory analysis of BTEX, naphthalene, 1, 2, 4-TMB, 1, 3, 5-TMB, and TPH (C6-C36). In addition, the samples collected from the base and sidewall which exhibited the highest VOC readings from separator dump line and produced water vessel excavations, and wellhead and flowline riser samples were submitted for laboratory analysis of pH, EC, SAR, and boron. Analytical results indicated that constituent concentrations in sample WH01 were in compliance with COGCC Table 915-1 standards, with exception to the pH value. Analytical results for the remaining samples exhibited constituent concentrations in compliance with the applicable COGCC Table 915-1 standards. Analytical results are summarized in Tables 1-3. GPS coordinates and field screened VOC concentrations are summarized in Table 4. Field screening and laboratory sample locations are illustrated on Figure 1 and 2. The laboratory reports are included as Attachment A and the wellhead and tank battery decommissioning field notes and photo log are included in Attachment B.

Soil Remediation Summary

| | |
|---|---|
| <input type="checkbox"/> In Situ | <input checked="" type="checkbox"/> Ex Situ |
| _____ Bioremediation (or enhanced bioremediation) | Yes Excavate and offsite disposal |
| _____ Chemical oxidation | If Yes: Estimated Volume (Cubic Yards) 5 |
| _____ 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

_____ 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

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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards 5

E&P waste (solid) description Hydrocarbon impacted material

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? 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? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted?

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.

Following wellhead and tank battery decommissioning activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with the COGCC 1000 series.

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 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. 09/02/2021

Proposed date of completion of Reclamation. 09/02/2022

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. 05/05/2021

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/16/2021

Proposed site investigation commencement. 09/02/2021

Proposed completion of site investigation. 09/02/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/02/2021

Proposed date of completion of Remediation. 09/02/2021

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

At the Holton 24-12 TB, analytical results indicated that constituent concentrations in sample WH01 @ 6' were in compliance with COGCC Table 915-1 standards, with exception to the pH value. Based on the absence of other indicators that a spill or release occurred, such as hydrocarbon detections or elevated EC and SAR in soil, the pH result at this location is not associated with E&P activities. As such, PDC requests that pH not be considered a Table 915-1 contaminant of concern at this location and is requesting a No Further Action (NFA) determination for this location.

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: 12/01/2021

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: 12/15/2021

Remediation Project Number: 19632

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. |
| 1 COA | |

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**

| | |
|-----------|--------------------------------|
| 402869976 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 402870030 | SOIL SAMPLE LOCATION MAP |
| 402873648 | PHOTO DOCUMENTATION |
| 402882689 | ANALYTICAL RESULTS |
| 402883691 | SOIL SAMPLE LOCATION MAP |

Total Attach: 5 Files

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

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)