

State of Colorado Oil and Gas Conservation Commission

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12/30/2021

Report taken by:

Candice (Nikki) Graber

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 #: 20066 Initial Form 27 Document #: 402802849

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

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-25595</u>	County Name: <u>WELD</u>
Facility Name: <u>CHURCHILL 5</u>		Latitude: <u>40.374268</u>	Longitude: <u>-104.559313</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNW</u>	Sec: <u>28</u>	Twp: <u>5N</u>	Range: <u>64W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Residential / Agriculture

Is domestic water well within 1/4 mile? No 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

Surface Water: Freshwater Pond - 478 feet E-SE, Occupied Buildings - 993 feet NW, Livestock - 0 feet (appears to be located within pastureland), FWS
Wetlands: Freshwater Emergent Wetland (PEM1C) - 421 feet SE

Flowline conflict likely as wellhead is located within both pastureland and 1/4-mile bound of Bald Eagle Active Nest Site (1202.c NSO); flowline crosses unrelated flowline at approximately 565' from wellhead

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	GROUNDWATER	Refer to Table 5 & Figure 1	Confirmation Groundwater Sampling
Yes	SOILS	Refer to Tables 1-4 & 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.

On October 20, 2021, field screening and confirmation soil sampling was conducted in accordance with the COGCC Rule 911 during the decommissioning and closure of the former Churchill 5 Wellhead (Figure 1) and associated flowline (Figure 2). During excavation activities, hydrocarbon impacted groundwater was encountered in the excavation at approximately 6 feet below ground surface (bgs). Analytical results for the excavation groundwater sample indicated that organic compound concentrations were in exceedance of the COGCC Table 915-1 standards.

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):

On October 20, 2021, wellhead decommissioning and confirmation sampling activities were completed at the Churchill 5 Wellhead. Two soil samples (WH01 and FLR01) were collected adjacent to the cut and capped well casing at approximately 6 feet bgs and below the flowline riser at approximately 3 feet bgs. The samples were submitted for the Table 915-1 Organic compounds in soil, TPH (C6-C36), and soil suitability for reclamation. Following the discovery of the release, soil sample WH01 was additionally submitted for analysis of Table 915-1 metals. Analytical results indicated that organic compound concentrations were below the applicable Table 915-1 Protection of Groundwater SSLs.

Proposed Groundwater Sampling

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

On October 20, 2021, one groundwater sample (GW05) was collected from the excavation. The groundwater sample was submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB. Analytical results indicated that organic compound concentrations were in exceedance of the COGCC Table 915-1 standards in sample GW05. The groundwater sample location is illustrated on Figure 1 and the analytical results are summarized on Table 5.

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 initial closure activities conducted on October 20, 2021, soil encountered on-site and below production equipment was visually inspected and field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Per the approved proposed soil sampling plan, samples were collected below the flowline riser at the separator, along the flowline at significant direction changes and where the flowline is in close proximity to High Priority Habitats as well as between ground surface and 6 inches in the four cardinal directions surrounding the wellhead. Sample locations collected during the initial decommissioning activities are illustrated on Figure 1.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 9

Number of soil samples exceeding 915-1 3

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 25

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 6'

Number of groundwater monitoring wells installed 0

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 2.01

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

-- Highest concentration of Benzene (µg/l) 7.1

-- Highest concentration of Toluene (µg/l) 13

ND Highest concentration of Ethylbenzene (µg/l)

-- Highest concentration of Xylene (µg/l) 11

NA 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 October 22, 2021, two background soil sample (BKG01) were collected at approximately 3 feet and 6 feet bgs, respectively, and submitted for analysis of pH, arsenic, and selenium. Analytical results indicate arsenic and selenium were in exceedance of the applicable regulatory standards.

☐ 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?

Five (5) groundwater monitoring wells will be installed via direct-push drilling methods to confirm the absence of dissolved-phase hydrocarbon impacts within and surrounding the former excavation extent. Volatile organic compound (VOC) concentrations using a photoionization detector (PID) and lithologic descriptions will be recorded for each borehole. If elevated VOC concentrations are encountered during the investigation, a sample will be collected from the interval exhibiting the highest VOC concentration from the borehole and submitted for laboratory analysis of the full Table 915-1 suite. Proposed monitoring well locations are illustrated on Figure 3.

Two (2) additional background soil borings will be advanced adjacent to the former excavation extent to evaluate Table 915-1 metals in native material. Confirmation sampling is expected to be conducted during the first quarter of 2022. The proposed background soil boring locations are illustrated on Figure 4.

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.

No investigative derived waste was generated as part of the Churchill 5 wellhead decommissioning and sampling activities. Any hydrocarbon impacted material generated in supplemental site investigative activities will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

REMEDIAL ACTION 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.

A remediation strategy will be selected following the evaluation of soil and groundwater analytical results.

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.

Based on the analytical data collected during source mass removal activities, PDC will conduct quarterly groundwater monitoring at the five proposed monitoring wells until closure criteria are met. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260B in accordance with Table 915-1. In addition, site-specific inorganic parameters, including total dissolved solids (TDS), chlorides, and sulfates, will be evaluated at the five proposed monitoring wells during the first quarter of 2022. Contingent on analytical results, inorganic parameter analysis will be discontinued after one sampling event.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☒ Other

Confirmation Sampling Summary, Analyte Reduction Request,
Supplemental Site Investigation Proposal

☐ 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 Confirmation Sampling Summary, Analyte Reduction
Request, Supplemental Site Investigation Proposal

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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:

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

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? No

Is additional groundwater monitoring to be conducted? Yes

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 flowline removal 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. 10/20/2021

Proposed date of completion of Reclamation. 12/17/2026

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. 08/05/2021

Actual Spill or Release date, or date of discovery. 10/20/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/27/2021

Proposed site investigation commencement. 09/27/2021

Proposed completion of site investigation. 03/31/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/20/2021

Proposed date of completion of Remediation. 12/17/2026

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

Following the approval of this form, PDC will install and conduct quarterly groundwater monitoring at the 5 proposed monitoring wells until closure criteria are met at the Churchill 5 Wellhead. A soil sample will be collected from the interval exhibiting the highest VOC concentration from each borehole and submitted for laboratory analysis of the full Table 915-1 suite. Additionally, PDC will conduct a supplemental site investigation to evaluate Table 915-1 metals in native material. This site investigation will be conducted in accordance to the Colorado Parks and Wildlife regulations as the Churchill 5 Wellhead is within the 1/4-mile bound of Bald Eagle Active Nest Site (1202.c NSO).

The Churchill 5,28-1,2,2-6B,7i Tank Battery and associated wellheads were decommissioned in succession during October of 2021. Per the COGCC issued COA following the approval of the Churchill 5 Wellhead Supplemental Form 19, a description of groundwater samples GW01 - GW05 are detailed below.

GW01: Collected at the Churchill 28-2 Wellhead
GW02: Collected along the Churchill 28-2 Flowline
GW03: Collected at the Churchill 2-6B Wellhead
GW04: Collected at the Churchill 2-7I Wellhead
GW05: Collected at the Churchill 5 Wellhead

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: ` 12/30/2021

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: Candice (Nikki) Graber

Date: 12/30/2021

Remediation Project Number: 20066

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

0 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**

402894383	FORM 27-SUPPLEMENTAL-SUBMITTED
402903381	ANALYTICAL RESULTS
402903382	PHOTO DOCUMENTATION
402903384	SITE INVESTIGATION PLAN
402913013	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)