

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403094720

Receive Date:

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: <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>COGCCSpilRemediation@pdce.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 17005 Initial Form 27 Document #: 402606512

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>LOCATION</u>	Facility ID: <u>472330</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Anderson 12-13</u>		Latitude: <u>40.488336</u>	Longitude: <u>-104.614693</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SENW</u>	Sec: <u>13</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 Cropland

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? No

Other Potential Receptors within 1/4 mile

Surface Water: Freshwater pond – 52 feet E, Occupied Buildings – 1,260 feet WNW, Livestock – 406 feet NW, FWS Wetlands – Freshwater Pond – 52 feet E, HP Habitat - location within Aquatic Native Species Conservation Easement

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
UNDETERMINED	GROUNDWATER	Refer to Table 5 and Figure 3	Implementation of Groundwater Assessment Plan
Yes	SOILS	Refer to Tables 1-6 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.

On March 31, 2021, field screening and confirmation soil sampling was conducted in accordance with the COGCC Rule 911 during the decommissioning and closure of the Anderson 12-13 Tank Battery (Figure 1). During decommissioning activities, a reportable release was discovered. Following the discovery, mitigation activities were initiated to delineate and remove remaining hydrocarbon impacts. During excavation activities, groundwater was observed in the excavations at approximately 6 feet below ground surface (bgs). Approximately 706 cubic yards (CY) of impacted material were removed and transported to the North Weld Waste Management Facility for disposal under PDC waste manifests.

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 April 1, 2021, one soil sample (SS03) was collected from the source area at approximately 4 feet bgs and submitted to Summit Scientific Laboratories for analysis of the full COGCC Table 915-1 analyte list. Preliminary analytical results indicate that site specific containments of concern (COCs) include BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, TPH (C6-C36), anthracene, 1-methylnaphthalene (M), 2-M, arsenic, and selenium. Between March 31 and April 7, 40 soil samples (SS01 – SS30 and SS32 – SS41) were collected from the sidewalls and base of the excavation at depths ranging from 3 feet to 7 feet bgs and were submitted for laboratory analysis of the above referenced COCs. In addition, one sample (SS31) was collected at approximately 2.5 feet bgs was submitted for analysis of Table 915-1 soil suitability constituents. The final excavation extent and sample locations are illustrated on Figure 2. Analytical results are summarized in Tables 1 through 4.

Proposed Groundwater Sampling

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

On April 7, 2021, one groundwater sample (GW01) was collected from the excavation following source mass removal activities and 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 compliance with applicable COGCC Table 915-1 groundwater standards. The groundwater sample location is illustrated on Figure 2 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 April 27, 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 and/or adjacent to the above ground storage tank (AST), separator flowline (SEP-FL), and produced water vessel (PWV). The samples were submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, and TPH (C6-C36). In addition, the excavation sidewall sample which exhibited the highest PID reading collected adjacent to the produced water vessel was submitted for analysis of Table 915-1 soil suitability constituents. Analytical results indicated that organic compounds and soil suitability constituents were in compliance with the applicable COGCC Table 915-1 Protection of Groundwater SSLs in all laboratory sample locations.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 46

Number of soil samples exceeding 915-1 25

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

Approximate areal extent (square feet) 2706

NA / ND

-- Highest concentration of TPH (mg/kg) 380

-- Highest concentration of SAR 3.27

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 7

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 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

-- Highest concentration of Xylene (µg/l) 2.3

NA Highest concentration of Methane (mg/l)

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.

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

On March 31, 2021, one background soil sample (BKG01) was collected at approximately 2.5 feet bgs from native material topographically up-gradient of the tank battery and submitted for analysis of COGCC Table 915-1 metals. Analytical results indicated that arsenic, barium, and selenium were in exceedance of the applicable regulatory standards in native soil.

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

Volume of solid waste (cubic yards) 706

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Eight (8) 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. Lithologic descriptions and volatile organic compound (VOC) concentrations using a photoionization detector (PID) 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 BTEX, naphthalene, total petroleum hydrocarbons (TPH C6-C36), 1,2,4-TMB, and 1,3,5-TMB anthracene, 1-M, 2-M, arsenic, and selenium by EPA Methods 8260B and 8015. Proposed monitoring well locations are illustrated on Figure 3.

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.

Between March 31 and April 6, 2021, approximately 706 CY of impacted material were removed from the excavation and transported to the North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests.

REMEDIAL 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.

Based on the analytical results, monitored natural attenuation (MNA) was selected as the remediation strategy for this site for the third quarter 2021 and will remain the selected remediation strategy through the third quarter 2022.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 706
_____ 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
Yes _____ 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.

PDC will conduct quarterly groundwater monitoring at the eight site monitoring wells (BH01 - BH08). Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260B, chloride and sulfate anions by EPA Method 300.0, total dissolved solids (TDS) by Method SM 2540C in accordance with Table 915-1, and dissolved selenium by EPA Method 200.8. Per the COA issued by the COGCC (Document No. 403012788), dissolved selenium concentrations have been compared to the Colorado Department of Health and Environment (CDPHE) agricultural water supply standard (5 CCR 1002-41, Table 3).

Second quarter 2022 analytical results indicated that inorganic parameters were in compliance with the applicable COGCC Table 915-1 regulatory standards in all eight monitoring well locations. In addition, dissolved selenium concentrations were below the applicable CDPHE agricultural water supply standard in all monitoring well locations. During the second quarter 2022, four consecutive quarters of organic compound concentrations in compliance with the COGCC Table 915-1 regulatory standards were achieved. Quarterly groundwater monitoring will continue until closure criteria are achieved.

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

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Operator does not have site-specific financial assurance for this project; however, Operator has inactive well, blanket, and surface bonding including Surety IDs 106077122, 106473808, and 106473820, as well as commercial general liability and/or umbrella/excess insurance meeting the requirements of Rule 705.b. Operator does not anticipate making an insurance claim for this project.

- Investigation and delineation has been completed in soil and groundwater.
- Source mass removal has been completed and monitoring wells were installed.
- Second quarter 2022 marked the fourth consecutive quarter of dissolved-phase organic compound concentrations in compliance with the applicable regulatory standards.
- Inorganic parameters and dissolved selenium in groundwater will continue to be monitored for natural attenuation.
- Facility and infrastructure were decommissioned and the location will be reclaimed in accordance with the COGCC 1000 Series.

Costs included herein are estimates only and may change over time based on numerous factors. Accordingly, Operator makes no guarantees as to the accuracy of such cost estimates, thus providing an estimate for the next year below.

Operator anticipates the remaining cost for this project to be: \$ 10000

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:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 706

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: North Weld Waste Management

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? 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? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

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 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. 03/31/2021

Proposed date of completion of Reclamation. 03/31/2026

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. 11/10/2020

Actual Spill or Release date, or date of discovery. 03/31/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/01/2021

Proposed site investigation commencement. 03/31/2021

Proposed completion of site investigation. 07/27/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/31/2021

Proposed date of completion of Remediation. 03/31/2026

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:

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OPERATOR COMMENT

This Supplemental Form 27 was submitted to summarize quarterly groundwater monitoring activities and analytical results collected during the second quarter 2022 at the former Anderson 12-13 tank battery location.

Second quarter 2022 groundwater analytical results indicated that TDS and sulfate anion concentrations were in compliance with the applicable regulatory standards for the third consecutive quarter. Additionally, chloride anion and dissolved selenium concentrations were in compliance with the applicable regulatory standards for the second consecutive quarter.

During the second quarter 2022, four consecutive quarters of organic compound concentrations in compliance with the COGCC Table 915-1 standards were achieved. Based on these results, PDC is requesting that BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB be removed from the quarterly sampling and analysis plan.

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: _____

Email: COGCCSpilRemediation@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: _____

Date: _____

Remediation Project Number: 17005

COA Type

Description

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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

403094755	MONITORING REPORT
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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)