

State of Colorado Oil and Gas Conservation Commission

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



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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: <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 #: 9950 Initial Form 27 Document #: 200440745

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>PIT</u>	Facility ID: <u>258442</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>TOEDTLI 22-2 PIT</u>		Latitude: <u>40.830655</u>	Longitude: <u>-103.736575</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNE</u>	Sec: <u>22</u>	Twp: <u>10N</u>	Range: <u>57W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SP

Most Sensitive Adjacent Land Use Rangeland

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

Intermittent tributary to Horsetail Creek approximately 1,220 feet southwest

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 Table 1 & Figure 1	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 28, 2016, site investigation activities were conducted to assess the potential presence of petroleum hydrocarbon impact associated with two historical evaporation pits and one adjacent tinhorn. Please refer to the LTE Site Investigation and Closure Request, dated December 29, 2016, for additional details. Six soil samples were collected from within the pits to evaluate potential hydrocarbon and inorganic impacts to the site. All six soil samples were analyzed for BTEX, and one was analyzed for EC, pH, and SAR. To evaluate background conditions at the site, a total of ten soil samples were collected from five background locations. One sample was collected from 1 foot below ground surface (bgs) and one from 3 feet bgs from each location. The samples were analyzed for EC, pH, and SAR.

Following PDC Energy's acquisition of this location in January 2020, documentation of reclamation activities and confirmation sampling requested by the State were not provided from the previous Operator; therefore, the requested confirmation sampling is detailed below.

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 September 15, 2021, eleven (11) soil borings were advanced across the former location to evaluate soil sustainability for reclamation. Twenty-two (22) soil samples were collected at approximately 1 foot and 3 feet bgs and were submitted for laboratory analysis of pH, EC, and SAR. Analytical results indicated pH levels and EC concentrations were observed in exceedance of the applicable Table 915-1 standards across soil borings BH01-BH03. Analytical results are summarized in Table 1 and GPS coordinates and field screened VOC concentrations are summarized in Table 2. Field screening and laboratory sample locations are illustrated on Figure 1. The laboratory reports are included as Attachment A and the soil boring logs are included in Attachment B.

Proposed Groundwater Sampling

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

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 22
Number of soil samples exceeding 915-1 4
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 5500

NA / ND

NA Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 1.82
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 _____

NA Highest concentration of Benzene (µg/l) _____
NA Highest concentration of Toluene (µg/l) _____
NA Highest concentration of Ethylbenzene (µg/l) _____
NA Highest concentration of Xylene (µg/l) _____
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 September 15, 2022, two (2) background soil samples (BKG01) were collected at 1 foot & 3 feet bgs from native material adjacent to the former pit. All background soil samples were submitted for analysis of the pH, EC, and SAR. Analytical results indicated that pH was 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) _____ Volume of liquid waste (barrels) _____

☒ Is further site investigation required?

Up to eight (8) soil borings will be advanced at the former location to horizontally and vertically delineate pH and EC exceedances remaining at this location. Volatile organic compound (VOC) concentrations using a photoionization detector (PID) and lithologic descriptions will be recorded for each borehole. Soil samples will be collected from necessary intervals to obtain horizontal or vertical delineation, to a maximum of 10 feet bgs and will be submitted for laboratory analysis of pH and/or EC.

Additionally, up to three (3) background soil borings will be advanced to approximately 10 feet bgs in native material adjacent to the former location to evaluate pH and EC in native conditions. Proposed soil boring locations are illustrated on Figure 2 included with this report.

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.

The Toedtli 22-2 pit and associated facilities have been abandoned.

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.

Per the Condition of Approvals (COA) issued by the COGCC on March 21, 2017 (Document # 401206319), supplemental site investigation and confirmation soil sampling was conducted adjacent to and within the former pit location to confirm that reclamation was successfully completed by the former operator of this location. Based on analytical results, supplemental site investigation activities will be conducted to vertically and horizontally delineate pH and EC constituents. Confirmation samples will be submitted for laboratory analysis in accordance with the 900 Series and Table 915-1. A summary of the analytical results and a photo log documenting on-going site investigation activities will be provided in a forth-coming Supplemental Form 27.

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
 _____ No Land Treatment
 _____ No Bioremediation (or enhanced bioremediation)
 _____ No Chemical oxidation
 _____ No 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.

Groundwater has not been encountered during site investigation activities at this facility.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Timeline Update, 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 Timeline Update, Supplemental Site Investigation Proposal

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.

- Facility and infrastructure were decommissioned and the location will be reclaimed in accordance with the COGCC 1000 Series.
- Investigation and delineation has been completed for organics in soil. Further soil investigation/delineation of inorganics and native material assessment of inorganics is required at the former Toedtli 22-2 pit.

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? 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:

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? 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.

Upon closure of the pit, this location was backfilled to the pre-existing grade or to match the surrounding topography as much as practical. Due to inorganic exceedances observed during the September 15, 2021 site investigation, additional delineation activities will be conducted at this location. Following the completion of investigation and delineation activities, a site-specific reclamation plan will be developed in accordance with the COGCC 1000 series.

Is the described reclamation complete? _____

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. 08/17/2027

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). _____

Proposed site investigation commencement. 10/01/2022

Proposed completion of site investigation. 12/31/2022

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

This form is being submitted as timeline and progress update for the Toedtli 22-2 pit. In accordance with the March 21, 2017 COGCC issued COA (Form # 401206319), inorganic concentrations have been evaluated at the former facility down to approximately 3 feet bgs. Based on the results, pH levels and EC concentrations were in exceedance of the applicable soil suitability for reclamation standards in soil borings SB01 through SB03.

Following the approval of this form and landowner approval, PDC will conduct a supplemental site investigation to delineate vertically and horizontally pH and EC inorganic concentrations at the Toedtli 22-2 pit. Additionally, a native material assessment will be conducted to further evaluate soil suitability for reclamation conditions in native material.

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: 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: _____

Date: _____

Remediation Project Number: 9950

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

403153225	SITE INVESTIGATION PLAN
403153228	SOIL SAMPLE LOCATION MAP
403153229	ANALYTICAL RESULTS
403153230	LOGS

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)