

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403093880

Receive Date:

07/13/2022

Report taken by:

Jason Kosola

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 #: 21625 Initial Form 27 Document #: 402904779

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>WELL</u>	Facility ID: _____	API #: <u>123-23657</u>	County Name: <u>WELD</u>
Facility Name: <u>SEELEY LAKE 5</u>		Latitude: <u>40.467880</u>	Longitude: <u>-104.727190</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SESW</u>	Sec: <u>24</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>333330</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SEELEY LAKE-66N66W 24SESW</u>		Latitude: <u>40.467880</u>	Longitude: <u>-104.727190</u>
		** correct Lat/Long if needed: Latitude: <u>40.468010</u>	Longitude: <u>-104.727645</u>
QtrQtr: <u>SESW</u>	Sec: <u>24</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Agricultural

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

Tank Battery: Surface Water: Irrigation Ditch - 500' S; Occupied Building: 840' WSW; Livestock: 555' S; FWS Wetlands: 230' W Freshwater Emergent Wetland (PEM1C); HPH Sensitive Wildlife Habitat: Rule 309.e.1: - Site Within Bald Eagle Roost Site.

Wellhead (Seeley Lake 5): Surface Water: Irrigation Ditch - 455' S; Occupied Building: 965' WNW; Livestock: 510' S; FWS Wetlands: 350' W Freshwater Emergent Wetland (PEM1C); HPH Sensitive Wildlife Habitat: Rule 309.e.1: 25' - SW Bald Eagle Roost Site.

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	SOILS	Refer to Tables 1-5 and Figures 1-3	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 Seeley Lake 3,5 production facility, Seeley Lake 5 wellhead, and removal of the off-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 (9/20/21), 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 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. Soil samples will be collected adjacent to the wellhead from native material and submitted for laboratory analysis of Organic Compounds in Soil and soil suitability.

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 the on-location flowline (estimated to be 150 ft in length) and soil samples will be collected below the flowline risers. The flowlines 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 collected for an initial assessment. Samples will be submitted for laboratory analysis of Organic Compounds in Soil and TPH (C6-C36). GPS data and photo documentation will be recorded.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 14

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 200

NA / ND

-- Highest concentration of TPH (mg/kg) 5

-- Highest concentration of SAR 1.53

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

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

Number of groundwater samples exceeding 915-1

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)

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 April 4, 2022, four background samples (BKG01) were collected from native material topographically up-gradient of the wellhead location and submitted for analysis of metals. Analytical results indicated that metals were in exceedance of the applicable Table 915-1 standard in native material. On April 4, 2022, three background samples (BKG01) were collected from native material topographically up-gradient of the wellhead location and submitted for analysis of EC. Analytical results indicated that EC 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) 18

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Based on the analytical results, supplemental site investigation activities will be conducted at the former wellhead flowline riser and separator dump line location to delineate elevated EC concentrations recorded during initial decommissioning activities. The proposed soil boring locations are illustrated on Figures 4 and 5.

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.

On April 1, 2022, approximately 9 cubic yards (CY) were removed from below the former separator dump line and transported to the North Weld Waste Management Facility for disposal under a PDC waste manifest. On April 4, 2022, approximately 9 cubic yards (CY) were removed from below the former produced water vessel and transported to the North Weld Waste Management Facility for disposal under a PDC waste manifest.

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 on site and below production equipment was visually inspected and field screened for VOC concentrations using a PID. Per the approved proposed soil sampling plan, samples were collected below and/or adjacent to the AST, SEP-FL and SEP-DL, and PWV and undisturbed areas most likely to be impacted by oil and gas operations located adjacent to and below production infrastructure (WH01 and FLR01). Soil samples collected below the AST and SEP01-FL were submitted for laboratory analysis of BTEXN, TMBs, and TPH. The remaining samples were submitted for laboratory analysis of the Table 915-1 Organic Compounds in Soil, TPH (C6-C36), EC, pH, SAR, and boron. In addition, the excavation base sample and sidewall sample which exhibited the highest PID reading collected adjacent to the PWV and SEP were submitted for laboratory analysis of metals. Analytical results indicated that organic compounds and soil suitability constituents were in compliance with the applicable COGCC Table 915-1 Protection of Groundwater SSLs, except for metals in samples SEP01-DL-B, SEP01-DL-S, PWV01-B and PWV01-W, and EC in SEP01-DL and FLR01. Consequently, four samples (BKG01) were submitted for lab analysis of metals and EC. Analytical results indicated that metals were in exceedance of applicable standards, and EC was in compliance with applicable standards in native material. Based on the analytical results, the elevated metal concentrations recorded in the samples collected at the former PWV and SEP01-DL location are representative of native soil conditions. Analytical results are summarized in Tables 1-4. GPS coordinates and field screened VOC concentrations are summarized in Table 5. Field screening and laboratory sample locations are illustrated on Figures 1-3. The laboratory reports are included as Attachment A and the wellhead, flowline and tank battery decommissioning field notes and photo logs are included in Attachment B.

Soil Remediation Summary

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

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.

- Further soil investigation activities are required at the former separator dump line and wellhead flowline riser to delineate elevated EC concentrations.
- 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: \$

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

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? 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 tank battery, wellhead and flowline abandonment 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. 04/04/2022

Proposed date of completion of Reclamation. 04/04/2023

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. 11/10/2021

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/10/2022

Proposed site investigation commencement. 08/01/2022

Proposed completion of site investigation. 12/30/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/01/2022

Proposed date of completion of Remediation. 12/30/2022

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 the analytical results collected during tank battery and wellhead decommissioning activities, additional site investigation is required adjacent to the location of the former wellhead and around the former separator to delineate EC concentrations recorded in samples FLR01 and SEP01-DL-S. PDC will conduct the supplemental site investigation by the end of 4Q2022.

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: 07/13/2022

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: 10/11/2022

Remediation Project Number: 21625

COA Type**Description**

	Operator will conduct additional investigation to determine whether barium in confirmation soil samples is within background or requires additional assessment and remediation.
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**

403093880	FORM 27-SUPPLEMENTAL-SUBMITTED
403093963	PHOTO DOCUMENTATION
403093970	SOIL SAMPLE LOCATION MAP
403093972	SOIL SAMPLE LOCATION MAP
403093977	SOIL SAMPLE LOCATION MAP
403104561	SITE INVESTIGATION PLAN
403104563	SITE INVESTIGATION PLAN
403104574	ANALYTICAL RESULTS

Total Attach: 8 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)