

State of Colorado Oil and Gas Conservation Commission

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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: DCP OPERATING COMPANY LP	Operator No: 4680	Phone Numbers
Address: 6900 E LAYTON AVE SUITE 900		Phone: (303) 605-1718
City: DENVER	State: CO	Zip: 80237
Contact Person: Steve Weathers	Email: swweathers@dcpmidstream.com	Mobile: (303) 619-3042

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18964 Initial Form 27 Document #: 402742310

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: 3Q22 Groundwater Monitoring Summary

SITE INFORMATION

No Multiple Facilities

Facility Type: GAS GATHERING PIPELINE SYSTEM	Facility ID: 480204	API #: _____	County Name: WELD
Facility Name: Parmlee #1	Latitude: 40.254977	Longitude: -104.266078	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 1	Twp: 3N	Range: 62W Meridian: 6 Sensitive Area? No

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

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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
No	GROUNDWATER	See Figure 4	Laboratory Analysis
No	SOILS	15500 sq ft	Laboratory Analysis

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Initial actions have previously been submitted to the COGCC in the Form 19 Initial (402726017) and Form 27 Initial (402742310). The COGCC issued a spill tracking facility ID #480204 and a remediation project #18964 for the Site. During routine inspections, DCP personnel observed distressed vegetation at the project location and on June 9, 2021; DCP initiated site investigation activities with a third-party environmental consultant using direct push drilling equipment. During the initial investigation, five soil borings and groundwater monitoring wells were installed and based on laboratory results, both soil and groundwater samples collected had impacts above the COGCC standards. During the fourth quarter 2021, impacted soil was remediated by excavation an offsite disposal, and details of that remediation were presented in an approved Form 27-S (#402929673). Details of the third quarter 2022 (3Q22) groundwater monitoring are presented in this Supplemental Form 27.

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):

The results of the initial soil investigation during monitoring well installation were presented in the Form 27-I (#402742310), and 4Q21 soil excavation details were reported in a Form 27-S (#402929673). During the 1Q22, seven groundwater monitoring wells were installed and soil results from that investigation are presented in a Form 27-S (#403003968).

Proposed Groundwater Sampling

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

As presented in previous COGCC documents, five monitoring wells were installed at the site during the initial investigation. All five of the original monitoring wells were removed during 4Q21 excavation activities, and seven new wells, illustrated on Figure 2, were installed during the 1Q22. During the 3Q22, wells were gauged, developed, and sampled on 8/30/2022. Groundwater elevations are presented on Table 1 with a potentiometric surface map presented on Figure 3; analytical results are presented on Tables 2 and 3 and illustrated on Figure 4; and lab reports are included as Appendix A. DCP proposes to continue groundwater monitoring on a quarterly basis until analytical results are below the COGCC standards for four consecutive quarterly monitoring events, at which time an NFA determination for the Site will be requested from the COGCC.

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 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 15500

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 4
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 30
Number of groundwater monitoring wells installed 7
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) _____
ND Highest concentration of Xylene (µg/l) _____
NA Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
0 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?

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

Volume of solid waste (cubic yards) 12500 Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

No impacts to groundwater were observed during the 3Q22 for the third consecutive quarter, and additional investigation is not anticipated at this time. As approved by COGCC, DCP will continue quarterly groundwater monitoring, and results of those sampling events will be provided in quarterly reports until criteria for site closure have been achieved.

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 the 4Q21 remediation, the extents of the soil excavation were determined by field screening, visual observation, and laboratory confirmation sampling. One laboratory confirmation sample was collected for approximately each 20 linear feet of sidewall and one base confirmation sample for approximately each 400 square feet of excavation area. Approximately 12,500 cubic yards (cy) of impacted soils were removed from the excavation covering approximately 15,500 square feet with a base between 33 to 34 feet below ground surface (ft bgs). Impacted soil was transported to the Waste Management Buffalo Ridge facility. Further details of the source removal are presented in the approved Form 27-S #402929673.

REMEDICATION 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.

During the 4Q21 remediation, the extents of the soil excavation were determined by field screening, visual observation, and laboratory confirmation sampling. One laboratory confirmation sample was collected for approximately each 20 linear feet of sidewall and one base confirmation sample for approximately each 400 square feet of excavation area. Approximately 12,500 cubic yards (cy) of impacted soils were removed from the excavation covering approximately 15,500 square feet with a base between 33 to 34 feet below ground surface (ft bgs). Impacted soil was transported to the Waste Management Buffalo Ridge facility. Further details of the source removal are presented in the approved Form 27-S #402929673. Seven monitoring wells were installed during the 1Q22 to replace wells that were removed during the excavation and to further characterize potential groundwater impacts. Ongoing quarterly groundwater monitoring will continue until a period of four consecutive monitoring events have demonstrated that groundwater impacts are below COGCC Table 915-1 standards. At that time, a no further action (NFA) determination for the Site will be requested from the COGCC.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 12500

_____ 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

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.

Ongoing quarterly groundwater monitoring was performed during the 3Q22 at the Site at the seven monitoring well locations illustrated on the attached Figure 2. Groundwater monitoring activities include Site-wide groundwater gauging and sampling. Groundwater levels are measured to evaluate hydraulic characteristics and provide information regarding seasonal fluctuations at the Site. Wells were gauged and sampled via standard hand bailing techniques on 8/30/2022 from four of the seven well locations and submitted to Origins Laboratory for Table 915-1 organics parameters. Two of the wells (MW07 and MW08) were dry, and one well produced an insufficient volume for sampling (MW09) during the 3Q22. Concentrations of Table 915-1 organic constituents were below the COGCC standards and/or the laboratory detection limits at all sampled well locations for the third consecutive quarterly monitoring event. Groundwater elevations are presented on Table 1 and illustrated on Figure 3. The laboratory results are presented on Tables 2 and 3 and Figure 4, and laboratory reports are included as Appendix A. Ongoing groundwater monitoring will continue on a quarterly basis until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below COGCC Table 915-1 standards. At that time, a no further action (NFA) determination for the Site will be requested from the COGCC.

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 3Q22 Groundwater Monitoring Summary

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.

DCP maintains appropriate comprehensive general liability insurance to satisfy the requirements of Rule 705.B, with at least \$5MM in coverage and including coverage for sudden and accidental release events. The cost provided below for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. DCP makes no representation or guarantees as to the accuracy of the preliminary estimate.

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:

None

Volume of E&P Waste (solid) in cubic yards 12500

E&P waste (solid) description Impacted soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Waste Management - Buffalo Ridge
Landfill

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 the 4Q21 excavation, site surfaces were backfilled with a landowner approved fill material and regraded to match existing conditions. Final reclamation will be conducted following completion of groundwater monitoring requirements, source remediation, no further action determination, and eventual site closure per COGCC and landowner approval.

Is the described reclamation complete? No

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. _____

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. 07/22/2021

Actual Spill or Release date, or date of discovery. 06/09/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/09/2021

Proposed site investigation commencement. 12/31/2022

Proposed completion of site investigation. 12/31/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/25/2021

Proposed date of completion of Remediation. 12/31/2022

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

Groundwater sampling was performed during the 3Q22 according to the site-specific sampling plan approved in the Form 27-I (#402742310). Concentrations of all sampled constituents were below the COGCC standards at all monitoring locations during the 3Q22 event for the third consecutive quarter. Ongoing groundwater monitoring will continue on a quarterly basis until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below COGCC Table 915-1 standards. At that time, a no further action (NFA) determination for the Site will be requested from the COGCC.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Steve Weathers

Title: Environmental Specialist

Submit Date: _____

Email: COGCCnotification@dcpmidstream.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: 18964

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**

403202347	OTHER
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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)