

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403101261
Receive Date:
10/25/2022
Report taken by:
RICK ALLISON

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 Phone: <u>(970) 313-5582</u> Mobile: <u>()</u>
Address: <u>1775 SHERMAN STREET - STE 3000</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>FRspillremediationcontractor@pdce.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22766 Initial Form 27 Document #: 403008744

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>436119</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Schmunk EF Offsite Tank Battery 31</u>	Latitude: <u>40.534297</u>	Longitude: <u>-104.701619</u>	
** correct Lat/Long if needed: Latitude: <u>40.534142</u>		Longitude: <u>-104.701656</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>31</u>	Twp: <u>7n</u>	Range: <u>65w</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Agricultural
Is domestic water well within 1/4 mile? Yes 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

The Schmunk EF tank battery is surrounded by agricultural land in all directions. An irrigation pond is in place ~430 feet north and irrigation ditches are in place ~1,275 feet west and ~1,320 feet east of the battery. A residential neighborhood is in place ~1,000 feet south. There is one groundwater well mapped within a ¼ mile of the battery. Groundwater depth is unknown but is expected to be encountered at less than 20 feet below ground surface (bgs). The 100-year floodplain of the Mead Lateral Ditch is mapped ~950 feet southwest of the battery. There are no other sensitive areas, wetland, or wildlife habitats identified within a quarter mile of the wellhead and flowline. See the attached Figure 1 for an illustration of the location of the Site.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	Refer to Figure 3 and Table 5	Grab Groundwater Sampling Activities
Yes	SOILS	Refer to Figure 3 and Tables 1-4	Excavation/Confirmation Soil Sampling Activities

INITIAL ACTION SUMMARY

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

A leak from a Balon valve at Condensate Tank #3 resulted in the release of approximately 47 bbls of oil all within unlined secondary containment. The release was discovered during a routine site visit on 2/23/2022 and was immediately stopped and completely contained on-site. Great Western conducted excavation activities inside the steel tank berm utilizing hydrovac equipment on 2/24/2022. All free oil, melted snow, and loose material were removed by the hydrovac. However, the roadbase/surface material was frozen and unable to be excavated. On 4/5/2022, a limited subsurface investigation was conducted with hand auger equipment within the steel tank berm, adjacent to the partially buried produced water tanks and west row of above ground storage tanks (ASTs). Six characterization soil samples were collected from five hand auger borings and submitted to Summit Scientific Laboratory (Summit) in Golden, CO for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB and Gasoline Range Organics (GRO) [C6-C10] by EPA Method 8260 and for Diesel Range Organics (DRO) [C10-C28] and Residual Range Organics (RRO) [C28-C40] by EPA Method 8015. At this time, laboratory analytical results have not been received. Based on the analytical results and observations made during the hand auger investigation and to address the impacted soil at the Site, remedial excavation activities were initiated on April 19, 2022, and completed on April 22, 2022.

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):

During excavation, operator will collect a sufficient number of excavation sidewall and base confirmation soil samples to demonstrate successful remediation. In addition, the four partially buried produced water tanks associated with the facility will be permanently removed. Operator will conduct field screening and confirmation soil sampling activities during excavation and removal of the partially buried produced water tanks in accordance with COGCC 900 Series Rules. Discrete soil samples will be collected and analyzed pursuant to Rule 915, following the general sample collection guidance in Rule 915.e.(2). Please refer to the attached Excavation Report.

Proposed Groundwater Sampling

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

Depth to groundwater is unknown but may be encountered within 20 feet of ground surface. Up to two test pits will be excavated to a depth of approximately 12 feet bgs between the water vaults and ASTs. If groundwater is encountered within the test pits or a pathway to groundwater is observed, ground water samples will be collected in accordance with COGCC Rule 915.e.(3)., and will be submitted to an accredited laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5 TMB by EPA Method 8260. Please refer to the attached Excavation Report.

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 33

Number of soil samples exceeding 915-1 8

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

Approximate areal extent (square feet) 4000

NA / ND

-- Highest concentration of TPH (mg/kg) 6190

-- Highest concentration of SAR 2.38

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 8

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 2

-- Highest concentration of Benzene (µg/l) 990

-- Highest concentration of Toluene (µg/l) 560

-- Highest concentration of Ethylbenzene (µg/l) 73

-- Highest concentration of Xylene (µg/l) 410

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?

One background soil sample (BG-1 1 Ft) was collected from an area to the south of the tank battery away from potential sources of impact related to the Site operations. Please refer to the attached Excavation Report.

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

Volume of solid waste (cubic yards) 1010

Volume of liquid waste (barrels) 53

Is further site investigation required?

Please refer to the attached Excavation Report and to Groundwater Monitoring section under the Remedial Action Plan tab of this Form 27 for a summary of the proposed additional site investigation activities.

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.

A total of approximately 1,010 cubic yards of hydrocarbon impacted soil, excavated from beneath the ASTs and partially buried produced water tanks, was hauled offsite for disposal under manifest to Waste Management's North Weld Landfill in Ault, Colorado. All waste generated was managed and disposed of in accordance with Rules 905 and 906. One to two feet of clean, washed pea gravel was added to the base of the excavation to facilitate future remediation if necessary.

Please refer to the attached Excavation Report for a summary of the source removal activities conducted at the Site. Copies of the waste manifests are attached.

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.

Please refer to the Source Removal Summary section above for a summary of the remediation activities conducted at the Site.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 1010

_____ 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.

PDC proposes to install ten groundwater monitoring wells and initiate quarterly groundwater sampling at the Site. Three monitoring wells will be installed in the former excavation to monitor the source zone. The remaining wells will be located to establish upgradient, cross-gradient, and downgradient points of compliance. During monitoring well installation, the on-site geologist will collect soil samples for laboratory analysis and will field screen and log the recovered soil to note soil types and evidence of potential hydrocarbon impact. Please refer to the attached Excavation Report for a summary of the proposed monitoring well installation activities. The proposed monitoring well locations are shown on Figure 4 of the attached Excavation Report.

PDC plans to conduct monitoring well installation activities during the fourth quarter of 2022. Groundwater samples will be collected from the monitoring wells on a quarterly schedule and will be submitted to an accredited laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, 1-methylnaphthalene, 2-methylnaphthalene, total dissolved solids (TDS), sulfate, and chloride by COGCC approved methods. Following 2 quarters of groundwater monitoring, a remediation plan will be developed and implemented based on analytical results. Quarterly groundwater sampling and analysis will continue until four consecutive quarters of analytical results demonstrate compliance with the applicable Table 915-1 standards.

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.

- Initial mitigation (excavation) activities have been conducted for soil.
- Source mass removal is mostly complete. Additional removal of source mass material may be needed.
- Investigation and delineation activities are ongoing for groundwater.
- Monitoring wells will be installed, and groundwater will be monitored quarterly.

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: \$ 30000 _____

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 _____ 1010

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Management's North Weld Landfill in Ault, CO

Volume of E&P Waste (liquid) in barrels _____ 53

E&P waste (liquid) description Produced water, oil, condensate, melted snow, roadbase

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Republic Services' Tower Landfill in Commerce City, CO

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.

The Schmunk EF tank battery is an active facility and there are no current plans for decommissioning or reclamation activities. This stated, following excavation activities, the location was backfilled, compacted and re-contoured for the tank battery operations to continue.

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. _____

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. 02/23/2022

Actual Spill or Release date, or date of discovery. 02/23/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/24/2022

Proposed site investigation commencement. 04/05/2022

Proposed completion of site investigation. 12/31/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/12/2022

Proposed date of completion of Remediation. 04/12/2025

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:

[Empty box for Basis for change in implementation schedule]

OPERATOR COMMENT

Location ownership transferred to PDC effective May 6, 2022.

This Form 27 was issued four COAs and returned to draft status by the COGCC on 10/17/22. Below, each COA is listed along with Operator comments to address each. Please also refer to the attached, updated Excavation Report.

COA #1: Soil confirmation sample has some errors. For example, W-7 indicates PAHs were analyzed, but the lab report indicates they were not. Please check all tables and figures.

Comment #1: The tables and figures have been reviewed and revised as necessary.

COA #2: Explain why PAHs were not analyzed around the west and north sides of the excavation. Additional sampling will be required. Propose soil borings along the excavation edges.

Comment #2: PAHs were inadvertently not analyzed for the northern and western sidewall soil samples. Three borings along the northern and western fringes of the previous excavation are proposed to confirm that soil is not impacted by PAHs.

COA #3: A monitoring well needs to be installed near W4, and two monitoring wells need to be installed in the source area.

Comment #3: A total of 10 monitoring wells and 3 soil borings are proposed. Two wells are proposed in the source area and one is proposed adjacent to the location of soil sample W4. The exact location of the well adjacent to W4 is contingent upon the location of the secondary containment wall.

COA #4: Analyze all groundwater samples for Table 915-1 organics and inorganics, plus 1-Methylnaphthalene and 2-Methylnaphthalene since soil near W-4 was left in-situ and the west and north walls of the excavation are uncharacterized for PAHs.

Comment #4: Groundwater samples will be analyzed for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 1-methylnaphthalene, 2-methylnaphthalene, total dissolved solids, sulfate, and chloride by COGCC approved methods.

PDC submitted a more recent Form 27 Supplemental Doc #403197680 on 10/14/22 as a quarterly update to the proposed soil boring/monitoring well installation schedule.

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

Signed: Jason Davidson

Title: Senior Env. Specialist

Submit Date: 10/25/2022

Email: FRspillremediationcontractor@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: 11/01/2022

Remediation Project Number: 22766

COA Type

Description

0 COA	
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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

403101261	FORM 27-SUPPLEMENTAL-SUBMITTED
403101613	DISPOSAL MANIFESTS
403101615	DISPOSAL MANIFESTS
403101616	DISPOSAL MANIFESTS
403207306	REMEDICATION PROGRESS REPORT

Total Attach: 5 Files

General Comments

User Group	Comment	Comment Date
Engineering Tech	Comments have been addressed, workplan is approved. Doc# 403197680 is not needed. Operator to submit Form 27 Supplemental on a quarterly schedule moving forward.	11/01/2022
Environmental	<p>Return to Draft:</p> <ol style="list-style-type: none"> 1. Soil confirmation sample has some errors. For example, W-7 indicates PAHs were analyzed, but the lab report indicates they were not. Please check all tables and figures. 2. Explain why PAHs were not analyzed around the west and north sides of the excavation. Additional sampling will be required. Propose soil borings along the excavation edges. 3. A monitoring well needs to be installed near W4,, and two monitoring wells need to be installed in the source area. 4. Analyze all groundwater samples for Table915-1 organics and inorganics, plus 1-Methylnaphthalene and 2-Methylnaphthalene since soil near W-4 was left in-situ and the west and north walls of the excavation are uncharacterized for PAHs. 	10/17/2022

Total: 2 comment(s)