

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

403185313

Receive Date:

10/25/2022

Report taken by:

Kari Brown

## 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>	<b>Phone Numbers</b>
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>tasfillremediationcontractor@pdce.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 15233 Initial Form 27 Document #: 402301827

#### 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>LOCATION</u>	Facility ID: <u>311414</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SHIVERS-62N66W 29NENE</u>		Latitude: <u>40.115108</u>	Longitude: <u>-104.793480</u>
		** correct Lat/Long if needed: Latitude: <u>40.112399</u>	Longitude: <u>-104.797044</u>
QtrQtr: <u>NENE</u>	Sec: <u>29</u>	Twp: <u>2N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>471003</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Shivers 1 &amp; 14-29</u>		Latitude: <u>40.112399</u>	Longitude: <u>-104.797044</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NENE</u>	Sec: <u>29</u>	Twp: <u>2N</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 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? Yes

### **Other Potential Receptors within 1/4 mile**

A riverine is located 60 feet north, a pond is located 420 feet southeast, and freshwater wetlands are located 520 feet northeast. Livestock is located 405 feet northeast and a residence is located 1,160 feet northeast. An irrigation well is located 940 feet northwest.

## 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 Figure 1 and Table 1	Site investigation

### INITIAL ACTION SUMMARY

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

Historic hydrocarbon impacts were discovered below former tank battery infrastructure following a post-reclamation site investigation.

### 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 January 17 and March 3, 2020, 15 soil borings (FSB01 – FSB15) were advanced to depths ranging between 7.5 feet and 11 feet below ground surface (bgs) using a hand auger. Soil encountered in the soil borings was field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Soil samples were collected from the vertical intervals which exhibited elevated field-measured VOC concentrations. Twenty-four soil samples were submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, and total petroleum hydrocarbons (TPH) – gasoline range organics (GRO) by Environmental Protection Agency (EPA) Method 8260B, TPH – diesel range organics (DRO) by EPA Method 8015. Analytical results indicated that TPH concentrations were in exceedance of COGCC Table 910-1 standards in six soil boring locations.

#### Proposed Groundwater Sampling

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

Groundwater was encountered during the investigations at approximately 8 feet bgs. A groundwater sample will be collected from the excavation following the completion of source mass removal activities.

#### 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 24

Number of soil samples exceeding 915-1 9

#### NA / ND

-- Highest concentration of TPH (mg/kg) 3190

NA Highest concentration of SAR

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

BTEX > 915-1 No

Approximate areal extent (square feet) 4877

Vertical Extent > 915-1 (in feet) 7

#### Groundwater

Number of groundwater samples collected 7

ND Highest concentration of Benzene (µg/l)           

Was extent of groundwater contaminated delineated? Yes

ND Highest concentration of Toluene (µg/l)           

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

ND Highest concentration of Ethylbenzene (µg/l)           

Number of groundwater monitoring wells installed 7

ND Highest concentration of Xylene (µg/l)           

Number of groundwater samples exceeding 915-1 0

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?

☐ 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?

Additional investigation activities will be conducted to determine the vertical and lateral extents of remaining hydrocarbon impacts in soil. A groundwater assessment will also be conducted following the evaluation of initial groundwater data.

### 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.

Based on the analytical results collected during the site investigation conducted in the first quarter 2020, remaining hydrocarbon impacted material will be removed via mechanical excavation and transported to a disposal facility under PDC waste manifests. Source mass removal activities will be scheduled at a later date pending land owner negotiations.

#### 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.

Monitored natural attenuation (MNA) was the selected remediation strategy for this location during the first quarter 2020 and will continue as the selected remediation strategy through the fourth quarter 2022.

#### Soil Remediation Summary

☐ In Situ

☐ 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

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.

Groundwater monitoring will continue on a quarterly basis at the seven site temporary monitoring wells (BH01 - BH07). Due to the location of the former tank battery and active farming activities, the temporary monitoring wells are installed via hand auger on a quarterly basis and subsequently abandoned following sampling activities. A GPS point is collected from each temporary monitoring well location to ensure the groundwater sample locations remain consistent between quarters. Groundwater samples will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260B in accordance with Table 915-1. Per the approved Supplemental Form 27 (Document No.402858935), the analysis of sulfate anions was removed from the quarterly sampling plan following the third quarter 2021 groundwater monitoring event.

Third quarter 2022 analytical results indicated that organic compound concentrations and inorganic parameters were in compliance with the applicable COGCC Table 915-1 regulatory standards in all seven monitoring well locations. During the third quarter 2022, four consecutive quarters of TDS and chloride anion concentrations in compliance with the applicable COGCC Table 915-1 regulatory standards were achieved. Quarterly groundwater monitoring will continue until closure criteria are achieved.

## REMEDATION 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.

Financial assurance information was included on the second quarter 2022 Supplemental Form 27 (Document No. 403126835). This section and estimate will be updated on an annual basis until closure criteria are met.

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:

## REMEDATION COMPLETION REPORT

### REMEDATION 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 completion of facility decommissioning activities, this 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. 08/09/2018

Proposed date of completion of Reclamation. 01/17/2025

## 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. 01/24/2020

Actual Spill or Release date, or date of discovery. 01/24/2020

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/17/2020

Proposed site investigation commencement. 01/17/2020

Proposed completion of site investigation. 03/03/2020

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/17/2020

Proposed date of completion of Remediation. 01/17/2025

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:

**OPERATOR COMMENT**

This Supplemental Form 27 was submitted to summarize quarterly groundwater monitoring activities and analytical results collected during the third quarter 2022 at the former Shivers 1 & 41-29 tank battery location.

Third quarter 2022 groundwater analytical results indicated that organic compound concentrations were in compliance with the applicable COGCC Table 915-1 regulatory standards in all seven monitoring well locations for the second consecutive quarter.

Additionally, during the third quarter 2022, four consecutive quarters of chloride anion and TDS concentrations in compliance with the applicable COGCC Table 915-1 regulatory standards were achieved. Based on these results, PDC is requesting that chloride anions and TDS are 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: 10/25/2022

Email: taspillremediationcontractor@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: Kari Brown

Date: 01/31/2023

Remediation Project Number: 15233

**COA Type****Description**

	COGCC agrees to the reduction of inorganic parameters.
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**

403185313	FORM 27-SUPPLEMENTAL-SUBMITTED
403207219	MONITORING REPORT

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)