

# State of Colorado Oil and Gas Conservation Commission

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Receive Date:

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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>	<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 #: 19816 Initial Form 27 Document #: 402795437

#### 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>WELL</u>	Facility ID: _____	API #: <u>123-13757</u>	County Name: <u>WELD</u>
Facility Name: <u>LOLOFF 35-5</u>		Latitude: <u>40.361111</u>	Longitude: <u>-104.509722</u>
		** correct Lat/Long if needed: Latitude: <u>40.361149</u>	Longitude: <u>-104.509716</u>
QtrQtr: <u>NENE</u>	Sec: <u>35</u>	Twp: <u>5N</u>	Range: <u>64W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Wetlands / Agriculture

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

Nearest Well: Irrigation - 1,365 feet N, Surface Water: Freshwater Pond - 250 feet E, Livestock: 0 feet (appears to be located within pastureland), FWS  
Wetlands: located within Freshwater Emergent Wetland (PEM1C) - 0 feet

Flowline conflict possible as wellhead and flowline are located within designated wetlands and appears to be located within pastureland

# 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	GROUNDWATER	Refer to Table 5 & Figures 1-2	Confirmation Groundwater Sampling
Yes	SOILS	Refer to Tables 1-4 & Figures 1-2	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 14, 2021, field screening and confirmation soil sampling was conducted in accordance with the COGCC Rule 911 during the decommissioning and closure of the former Loloff 35-5 Wellhead (Figure 1) and associated flowline (Figure 2). During decommissioning activities, historic hydrocarbon impacts were discovered at the wellhead. Following this discovery, mitigation activities were initiated to delineate and remove remaining hydrocarbon impacts. During excavation activities, groundwater was encountered in the excavation at approximately 3 feet below ground surface (bgs). Approximately 30 cubic yards (cy) of impacted material were excavated and transported to the North Weld Waste Management Facility for disposal under PDC waste manifests. Additionally, approximately 8 barrels (bbls) of impacted groundwater were removed from the excavation and transported to the NGL C6 facility for disposal under PDC waste manifests.

## 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 October 14, 2021, one soil sample (SS01) was collected adjacent to the cut and capped wellhead from the impacted source material at approximately 3 feet bgs and submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite. Analytical results indicated contaminants of concern (COC) include BTEX, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, TPH, pH, SAR, arsenic and lead. Additionally on October 14, 2021, nine soil samples (SS02-SS10) were collected from the base and sidewalls of the excavation at depths ranging between 2.5 feet and 5 feet bgs. The samples were submitted for laboratory analysis of the above referenced COCs. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 915-1 Protection of Groundwater SSLs in all samples collected from the final excavation extent.

### Proposed Groundwater Sampling

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

On October 14, 2021, one groundwater sample (GW01) was collected from beneath the flowline where groundwater was encountered at a significant direction change. A second groundwater sample (GW02) was collected from the excavation. The groundwater samples were submitted for laboratory analysis of BTEX, N, 1,2,4-TMB and 1,2,5-TMB. Analytical results indicated that all analyzed constituents were below the applicable COGCC Table 195-1 Standards.

### 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 ):

During initial closure activities conducted on October 14, 2021, soil encountered on-site and below production equipment was visually inspected and field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Per the approved soil sampling plan, three field screened soil samples were collected adjacent to/below the flowline at 3' bgs. One flowline sample (FL01-01) was collected from beneath a significant direction change in the flowline and was submitted for laboratory analysis of BTEX, 1,2,4-TMB, 1,3,5-TMB, naphthalene, and TPH. Analytical results indicated that organic compound concentrations were below the applicable COGCC Table 915-1 Protection of Groundwater SSLs.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 20

Number of soil samples exceeding 915-1 20

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

Approximate areal extent (square feet) 328

### NA / ND

-- Highest concentration of TPH (mg/kg) 4180

-- Highest concentration of SAR 9.1

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 5

### Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 3

Number of groundwater monitoring wells installed 0

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

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 October 15, 2021, three background soil samples (BKG01) were collected at approximately 2.5 feet, 4 feet, and 5 feet bgs, respectively, from native material topographically up-gradient of the wellhead and were submitted for analysis of pH, sodium adsorption ratio (SAR), and the COGCC Table 915-1 metals. Additionally on November 30, 2022, six background soil samples (BKG02 and BKG03) were collected from approximately 2.5 feet, 4 feet, and 5 feet bgs, respectively, from native material topographically up-gradient of the wellhead and were submitted for analysis of pH, SAR, arsenic, and barium.

On November 2, 2022, two background soil borings (BKG04 and BKG05) were advanced in native material to the northwest of the former wellhead. Ten soil samples were collected from the borings at depths ranging from approximately 2.5 feet to 8 feet bgs and were submitted for laboratory analysis of pH, SAR, arsenic, and lead.

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

Volume of solid waste (cubic yards) 30

Volume of liquid waste (barrels) 8

☒ Is further site investigation required?

On March 23, 2022, four monitoring wells were installed via direct-push drilling methods to confirm the absence of dissolved-phase hydrocarbon impacts within and surrounding the former excavation extent as well as define the vertical and horizontal extent of Table 915-1 metal and soil suitability constituents identified in soil samples collected from the final excavation extent. Due to reclamation activities and land access requirements, monitoring well BH01 was installed on June 9, 2022. Two soil samples were collected from boreholes BH02 – BH05 at depths of 2.5 feet and 4 feet bgs and were submitted to Summit for analysis of pH, SAR, arsenic, and lead. One soil sample was collected from the terminus of borehole BH01 at approximately 11 feet bgs and was submitted to Summit for analysis of pH. Soil analytical results indicated that inorganic concentrations were in compliance with the applicable COGCC regulatory standards or within 1.25x background concentrations in all nine soil sample locations, aside from the arsenic concentration in BH05 @ 2.5'.

On November 2, 2022, four soil borings (SB01-SB04) were advanced to a depth of approximately 8 feet bgs using a Soggy Bottom Sampler System (SBS) to delineate inorganic constituents in soil samples collected during October 2021 source mass removal activities. Eight confirmation soil samples were collected from soil borings SB01 – SB04 at depths of approximately 6 feet and 8 feet bgs. Soil samples collected from SB01 were submitted for laboratory analysis of SAR, soil samples collected from borings SB02 and SB04 were submitted for analysis of pH, and samples collected from boring SB03 were submitted for analysis of pH, SAR, and arsenic.

Soil analytical results indicated that SAR concentrations were in compliance with the applicable regulatory standards in all sample locations. Arsenic and pH concentrations were in exceedance of the applicable regulatory standards in all sampled boring locations.

## 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 October 14, 2021, approximately 30 CY of impacted solids were removed from the excavation and transported to North Weld Waste Management Facility in Ault, Colorado for disposal under PDC waste manifests. Additionally, groundwater vacuum recovery was conducted concurrent with excavation activities and approximately 8 barrels of groundwater were removed from the excavation and transported to the NGL C6 facility for disposal under PDC waste manifests.

## 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.

Based on the analytical results collected during supplemental site investigation activities conducted on November 2, 2022, the vertical and horizontal extents of elevated lead and SAR concentrations recorded during source mass removal activities were successfully delineated. In addition, a statistical evaluation of arsenic concentrations collected during all field activities indicated that elevated arsenic concentrations are present within the shallow sub-surface in native soils and as such, are not a result of the oil and gas operations or the historic release.

Monitored natural attenuation was the selected strategy for this location for the second quarter 2022 and will remain the selected remediation strategy for the first quarter 2023.

## Soil Remediation Summary

☐ In Situ

☒ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 30

\_\_\_\_\_ 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.

PDC will conduct quarterly groundwater monitoring at the five site monitoring wells (BH01 - BH05) until closure criteria are met. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260B, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C in accordance with Table 915-1.

Fourth quarter 2022 groundwater analytical results indicated that organic compound concentrations and inorganic parameters were in compliance with the applicable COGCC Table 915-1 regulatory standards in all five monitoring well locations.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☒ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Supplemental Site Investigation Summary

#### ☐ 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 Supplemental Site Investigation 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.

Financial assurance information was included on the second quarter 2022 Supplemental Form 27 (Document No. 403107000). This section and estimate will be updated on an annual basis until closure criteria are achieved.

Operator anticipates the remaining cost for this project to be: \$ 20000

### 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 30

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: North Weld Waste Management

Volume of E&P Waste (liquid) in barrels 8

E&P waste (liquid) description Hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: NGL C6

## 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 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. 10/14/2021

Proposed date of completion of Reclamation. 01/24/2027

## 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. 06/24/2021

Actual Spill or Release date, or date of discovery. 10/14/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/20/2021

Proposed site investigation commencement. 09/20/2021

Proposed completion of site investigation. 11/02/2022

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/20/2021

Proposed date of completion of Remediation. 01/24/2027

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 fourth quarter 2022 at the former Loloff 35-5 Wellhead location.

Fourth quarter 2022 groundwater analytical results indicated that organic compound concentrations were in compliance with the applicable COGCC Table 915-1 regulatory standards in all five monitoring well locations for the third consecutive quarter. Additionally, inorganic parameters were in compliance with the applicable regulatory standards in all monitoring wells for the second consecutive quarter.

Soil analytical results received for samples collected during supplemental site investigation activities, conducted on November 2, 2022, indicated that SAR concentrations were in compliance with the applicable regulatory standards in all sample locations. Arsenic and pH concentrations were in exceedance of the applicable regulatory standards in all sampled boring locations.

Based on these results, SAR and lead exceedances recorded in soil samples SS07 - SS10, collected from the final excavation extent in October 2021, have been successfully delineated.

Additionally, based on analytical results for background samples collected on November 2, 2022, pH levels recorded in samples collected from the final excavation extent are below native background levels exhibited in background soil borings BKG04 and BKG05 and indicative of native material. Furthermore, the pH level recorded in the source mass characterization sample (SS01) is below background levels. Based on this data, PDC is requesting to remove pH as a contaminate of concern for this project.

Based on the location of monitoring wells BH02 - BH05, located approximately 15 feet away from the former excavation extent, the arsenic concentrations recorded in samples collected from these monitoring wells can be considered background material. A statistical evaluation of arsenic in confirmation soil samples and background soil was conducted. The data indicated that arsenic concentrations were highly variable at all depths of collection, with a general trend of higher overall concentrations recorded at shallower intervals. The statistical evaluation also indicated that the background arsenic concentration recorded in BH05 @ 2.5' (4.03 mg/kg) was an outlier and consequently, was not used to compare to arsenic concentrations recorded in excavation confirmation samples; however, this outlier still represents evidence of the high variability of arsenic concentrations on site.

Due to the high variability of arsenic concentrations at shallower depths, the highest arsenic concentration (2.17 mg/kg), recorded in soil sample BH04 @ 2.5', was used to compare to the remaining arsenic exceedances recorded in excavation confirmation samples collected in October 2021.

The arsenic concentrations recorded in soil samples SS06 @ 2.5' (2.72 mg/kg) and SS07 @ 4' (2.79 mg/kg) are within 0.01 mg/kg and 0.08 mg/kg of the 125% threshold of the background concentration in BH04 @ 2.5'. Additionally, the arsenic concentration in source waste characterization sample SS01 was below 1.25x the arsenic concentration recorded in soil sample BH04 @ 2.5'. Based on these results, elevated arsenic concentrations are not a result of the historic hydrocarbon release and as such, PDC is requesting to remove arsenic as a contaminate of concern for this remediation project.

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: 12/13/2022

Email: [taspillremediationcontractor@pdce.com](mailto: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: RICK ALLISON

Date: 03/22/2023

Remediation Project Number: 19816

### 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

403234477	FORM 27-SUPPLEMENTAL-SUBMITTED
403254831	MONITORING REPORT

Total Attach: 2 Files

## General Comments



<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)