

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403466904

Receive Date:

Report taken by:

Site Investigation and Remediation Workplan (Initial 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: (970) 378-6373
City: DENVER	State: CO	Zip: 80237
Contact Person: Chandler Cole	Email: Chandler.E.Cole@p66.com	Mobile: (970) 939-0329

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: Initial Form 27 Document #: 403466904

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: SPILL OR RELEASE	Facility ID: 484282	API #: _____	County Name: WELD
Facility Name: Coan AT-1-1		Latitude: 40.010331	Longitude: -104.477020
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SWNE	Sec: 31	Twp: 1N	Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use rangeland

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? No

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	undetermined	monitoring well and laboratory analysis
Yes	SOILS	972 sq ft	Field screening and 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.

On 4/14/23, a condensate release was discovered on a 10-inch DCP line approximately 0.45 miles southwest of County Road (CR) 63 and CR 4. The release was identified by DCP Operations and upon discovery, DCP immediately shut in the line to prevent further release. The landowner was notified of the release immediately. Excavation activities began on 4/18/23 and excavation efforts between 4/18/23 and 5/4/23 removed approximately 1200 cubic yards of contaminated soil for disposal at Buffalo Ridge Landfill.

All visual and soil impacts are presented in the approved initial Form 19I (#403374534) and Form 19S (#403380838) and COGCC issued spill/release point ID #484282. Impacted material has been removed in accordance with COGCC approval to adhere to Residential Soil Standard and the extents of the excavation were determined by field screening soils using a PID and laboratory analysis. Sidewall and base samples were submitted for laboratory analysis of Table 915 VOCs, TPH, and select PAHs. Following the backfilling of the excavation, DCP notified the landowner and in abundance of caution, informed the landowner a temporary monitoring well would be installed after source removal activities to evaluate the depth of water and if any impacts were present. DCP collected a groundwater sample for Table 915-1 organics and the results indicated there were minor impacts. This F27 Initial is being presented as an interim remediation status report, and future remediation activities will be provided to the COGCC in subsequent Form 27 submittals.

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):

Previous soil sampling was presented in the approved F19-S reports and in the draft F19-S (90-day) spill closure request (#403466854). Based on the source soil results, a reduced analyte list was approved by COGCC which are presented on Table 3. On 6/21/23, a borehole was advanced to 43 feet below ground surface (ft bgs) to determine the depth of groundwater. Soil samples were not collected and based on the results of the groundwater sample collected, additional borings/wells are warranted to horizontally delineate the groundwater impacts. The soil borings will be logged to evaluate geological conditions and identify any potential impacts to soil and groundwater at these locations. Soil samples will be collected in the zone with the highest PID reading and/or the total depth of boring. Samples will be submitted for laboratory analysis for the approved reduced analyte list and the results will be presented to the COGCC in a subsequent Form 27 report.

Proposed Groundwater Sampling

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

One groundwater sample has been collected from a temporary monitoring well (MW01) that was installed near the source area. The results are presented in Table 4, and groundwater sample locations are presented in Figure 4. Based on the initial groundwater results, additional monitoring wells are needed and DCP is proposing a monitoring well network to the COGCC for approval in this Form 27 report and presented on Figure 4. Following installation and development of the monitoring wells (scheduled for 7/26/23), samples will be collected and submitted for laboratory analysis of Table 915-1 parameters and the results will be presented to the COGCC in a subsequent F27-S 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):

Laboratory data indicated that all soil in exceedance of COGCC Protection of Groundwater Standards has been removed. Groundwater was not initially observed in the excavation, however, DCP notified the landowner a temporary monitoring well would be installed, and a sample would be collected. DCP installed a temporary well approximately 5 feet below the excavation depth on June 19, 2023 and groundwater was encountered. The laboratory results of the groundwater sample are presented on Table 4 and on Figure 3.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 18

Number of soil samples exceeding 915-1 11

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

Approximate areal extent (square feet) 972

NA / ND

-- Highest concentration of TPH (mg/kg) 5960

NA Highest concentration of SAR

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 37

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 39

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 34.2

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?

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

Volume of solid waste (cubic yards) 1200

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

DCP will complete quarterly groundwater monitoring activities at the five monitoring well locations. Based on current observations, DCP is evaluating the site characteristics and does not propose further site investigation activities at this time. If warranted and with COGCC approval, additional groundwater monitoring wells may be needed to determine the horizontal extents and will be presented in a subsequent Form 27 Supplemental workplan.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 1700 tons (~1200 cubic yards [CY]) of impacted material were transported to Buffalo Ridge Landfill for offsite disposal during April and May 2023. A final tonnage report will be presented in a subsequent Form 27 upon request.

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.

Approximately 1200 cy of impacted material were excavated and transported to the Waste Management Buffalo Ridge landfill. Based on the original gathering line release excavation and investigative activities, remaining soil and groundwater impacts will be addressed in a subsequent Form 27 if needed. DCP is planning to install 4 additional monitoring wells and following well installation, ongoing groundwater monitoring at the 5 wells is scheduled to be performed at the Site and will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below COGCC Table 915 standards, a no further action (NFA) determination for the Site will be requested from the COGCC. If warranted, DCP would consider evaluating further investigation and alternative remediation approaches applicable to the Site with landowner and COGCC approval, which may include, but not limited to the potential use of in-situ remediation or other treatment.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 1200

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

No _____ 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.

One representative groundwater sample was collected from temporary monitoring wells on June 19th, 2023, and the results are presented in Table 4, and groundwater sample locations are presented on Figure 3. Initial groundwater results at the source area indicated impacted groundwater and a monitoring well network illustrated in Figure 4 is being proposed by DCP for COGCC approval in this Initial Form 27 work plan. DCP is planning to install 4 additional monitoring wells and following well installation, ongoing groundwater monitoring at the 5 wells is scheduled to be performed at the Site and will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below COGCC Table 915 standards, and 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

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: \$ 50000

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:

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 completion of the ongoing remedial activities, site surfaces will be regraded to match existing conditions with landowner and Weld County approval. Final reclamation will be conducted following completion of the soil investigation, groundwater monitoring, and well decommissioning once a no further action determination, and eventual site closure is approved by the COGCC.

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. 04/14/2023

Actual Spill or Release date, or date of discovery. 04/14/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/18/2023

Proposed site investigation commencement. 06/19/2023

Proposed completion of site investigation. 12/31/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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 Form 27 Initial is being submitted to update the COGCC on the initial investigation and remediation efforts at the COAN AT-1-1 Release in Weld County, Colorado that was initially reported with a Form 19I (#403374534) and Form 19S (#403380838). Due to observed groundwater impacts, this site will require groundwater monitoring will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below COGCC Table 915 standards, a no further action (NFA) determination for the Site will be requested from the COGCC. Upon approval of this document and the assignment of a remediation number to this site, DCP will submit a 90-day Form 19 Supplemental (#403466854) that is currently in draft form, requesting closure of the release to continue under Form 27 reporting.

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

Signed: Chandler Cole

Title: Compliance Coordinator

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: _____

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**

403467693	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)