

State of Colorado
Energy & Carbon Management Commission



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Document Number:

403592933

Date Received:

11/13/2023

Spill report taken by:

Robinson, Taylor

Spill/Release Point ID:

485685

SPILL/RELEASE REPORT (INITIAL /w SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

OPERATOR INFORMATION

Name of Operator: <u>PDC ENERGY INC</u>	Operator No: <u>69175</u>	Phone Numbers
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(970) 313-5582</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Jason Davidson</u>		Email: <u>taspillremediationcontractor@pdce.com</u>

Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 403592933

Initial Report Date: 11/13/2023 Date of Discovery: 11/10/2023 Spill Type: Historical Release

Spill/Release Point Location:

QTRQTR NWSE SEC 29 TWP 5N RNG 65W MERIDIAN 6

Latitude: 40.367777 Longitude: -104.682182

Municipality (if within municipal boundaries): _____ County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

Reference Location:

Facility Type: TANK BATTERY Facility/Location ID No 311389

Spill/Release Point Name: S-AST IkenouyeF29-22,23Tank Battery Well API No. (Only if the reference facility is well) 05- -

No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): Unknown Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): 0

Estimated Other E&P Waste Spill Volume(bbl): 0 Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: _____

Has the subject Spill/Release been controlled at the time of reporting? Yes

Land Use:

Current Land Use: CROP LAND Other(Specify): _____

Weather Condition: 30s and Sunny

Surface Owner: FEE Other(Specify): _____

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

PDC discovered a reportable release at the Ikenouye F 29-22, 23 Tank Battery at the southern above ground storage tank (AST). Release clean-up and delineation activities are underway.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
11/10/2023	ECMC	Taylor Robinson	-	
11/10/2023	Surface Owner	NA	-	
11/10/2023	Weld CO	NA	-	
11/13/2023	CPW	NA	-	

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

No Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: _____ Public Water System: _____
Residence or Occupied Structure: _____ Livestock: _____
Wildlife: _____ Publicly-Maintained Road: _____

No Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery _____ (HH:MM)
Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 _____
Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? _____
Enter the Document Number of the Initial Accident Report, Form 22 _____
Was there damage during excavation? _____
Was CO 811 notified prior to excavation? _____

No Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): _____

No Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:

The presence of free product or hydrocarbon sheen Surface Water

The presence of free product or hydrocarbon sheen on Groundwater

The presence of contaminated soil in contact with Groundwater

The presence of contaminated soil in contact with Surface water

Yes Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylight from the subsurface.

No Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.

Areas offsite of Oil & Gas Location Off-Location Flowline right of way

No Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.

No Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

SPILL/RELEASE DETAIL REPORTS

#1 Supplemental Report Date: 11/13/2023

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	_____	<input checked="" type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	0	0	<input type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<input type="checkbox"/>

specify: _____

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit

Impacted Media (Check all that apply) Soil Groundwater Surface Water Dry Drainage Feature

Surface Area Impacted: _____ Length of Impact (feet): _____ Width of Impact (feet): _____

Depth of Impact (feet BGS): _____ Depth of Impact (inches BGS): _____

How was extent determined?

On November 10, 2023, a historic release was discovered during decommissioning activities at the Ikenouye F 29-22, 23 Tank Battery at the southern AST following the receipt of final analytical results. One soil sample (AST03) was collected adjacent to the former southern AST location between ground surface and 6 inches below ground surface (bgs). Per the approved Initial Form 27 Document #403480268, this soil sample was submitted for laboratory analysis of the Table 915-1 organic compounds in soil. Final analytical results indicated 1,3,5-trimethylbenzene was in exceedance of the applicable Table 915-1 Protection of Groundwater (POG) Soil Screening Level (SSL). Mitigation and confirmation sampling activities are currently ongoing.

Soil/Geology Description:

Ellicott-Ellicott sandy-skeletal complex, 0 to 3 percent slopes, rarely flooded

Depth to Groundwater (feet BGS) 7 Number Water Wells within 1/2 mile radius: 18

If less than 1 mile, distance in feet to nearest

Water Well	<u>1353</u>	None <input type="checkbox"/>	Surface Water	<u>221</u>	None <input type="checkbox"/>
Wetlands	<u>173</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>

Additional Spill Details Not Provided Above:

Final analytical results and field activities will be summarized in a forthcoming Supplemental Form 27.

CORRECTIVE ACTIONS#1 Supplemental Report Date: 11/13/2023Root Cause of Spill/Release Unknown (Historical)

Other (specify) _____

Type of Equipment at Point of Spill/Release: Other

If "Other" selected above, specify or describe here:

Above-ground storage tank (oil)

Describe Incident & Root Cause (include specific equipment and point of failure)

On November 10, 2023, a historic release was discovered during decommissioning activities at the Ikenouye F29-22, 23 tank battery at the southern AST following the receipt of analytical results. Due to the historic nature of the release, a root cause was not identified.

Describe measures taken to prevent the problem(s) from reoccurring:

The tank battery and associated infrastructure was removed and will not be replaced.

Volume of Soil Excavated (cubic yards): 0Disposition of Excavated Soil (attach documentation) Offsite Disposal Onsite Treatment
 Other (specify) _____Volume of Impacted Ground Water Removed (bbls): 0Volume of Impacted Surface Water Removed (bbls): 0**REQUEST FOR CLOSURE**

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure: Corrective Actions Completed (documentation attached, check all that apply) Horizontal and Vertical extents of impacts have been delineated. Documentation of compliance with Table 915-1 is attached. All E&P Waste has been properly treated or disposed. Work proceeding under an approved Form 27 (Rule 912.c).Form 27 Remediation Project No: 31424 SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.**OPERATOR COMMENTS:**

PDC is submitting this analyte reduction request for the historic release that was discovered at the Ikenouye F29-22, 23 tank battery at the southern AST. In accordance with Rule 915.E.(2).C. guidance of the released E&P waste being petroleum based and type of equipment attributing to the release being an AST, PDC is requesting the contaminants of concern for this release be limited to the Table 915-1 Organic Compounds in soil. Should the ECMC, EPS agree with the above assessment, confirmation soil samples will be analyzed for the Table 915-1 Organic Compounds in soil.

Field activities and final analytical results will be summarized in a forthcoming Supplemental Form 27. Supplemental site investigation activities will be conducted in accordance with the Colorado Parks and Wildlife regulations as the Ikenouye F 29-22, 23 tank battery is

within an Aquatic Native Species Conservation Area, Mule Deer Winter Conservation Area, Mule Deer Severe Winter Range, and within a 100-year floodplain.

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

Signed: _____ Print Name: Jason Davidson
 Title: Senior Env. Specialist Date: 11/13/2023 Email: taspillremediationcontractor@pdce.com

COA Type	Description
	Quarterly reporting is required under Remediation Project #31424.
	Operator did not provide a waste characterization sample; therefore, ECMC cannot approve the analyte reduction request. Once a WCS is submitted, ECMC will evaluate the reduction request at that time.
2 COAs	

Attachment List

Att Doc Num	Name
403592933	FORM 19 SUBMITTED
403592965	TOPOGRAPHIC MAP
403592967	SOIL SAMPLE LOCATION MAP
403592968	ANALYTICAL RESULTS
403592970	PHOTO DOCUMENTATION

Total Attach: 5 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)