

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
BOB CHESSON

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
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Karen Olson</u>	Email: <u>taspillremediationcontractor@pdce.com</u>	Phone: <u>(303) 860-5800</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9365 Initial Form 27 Document #: 200438026

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>TANK BATTERY</u>	Facility ID: <u>444062</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Dechant Tank Battery 444062</u>	Latitude: <u>40.179994</u>	Longitude: <u>-104.602471</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>31</u>	Twp: <u>3N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use CROP LAND
 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

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 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	See figure 3 and table 2	Drilling and groundwater sampling
Yes	SOILS	See figure 2 and table 1	Excavation and 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 November 24, 2009, historic impacts were discovered below the produced water vault at the Dechant 1-31A production facility. Excavation activities were completed by LT Environmental as described in the Form 19 (Spill # 1631206). Approximately 900 cubic yards of impacted material were removed from the former excavation.

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):

Proposed Groundwater Sampling

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

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):

Between December 2009 and August 2012, LTE installed sixteen (16) temporary monitoring wells (MW01-MW05, MW07-MW10, MW10R, and MW11-MW16) for monitoring and remediation purposes. Groundwater was encountered during drilling activities at approximately 14 feet below ground surface (bgs). Quarterly groundwater monitoring was initiated on December 16, 2009. In March 2013, remediation and monitoring responsibilities were transferred to Tasman, Inc. (Tasman). Between January 2014 and January 2016, eight additional monitoring wells (MW17 – MW23) were installed to replace previously destroyed monitoring wells and establish point of compliance (POC).

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

NA / ND

_____ Highest concentration of TPH (mg/kg) _____
_____ Highest concentration of SAR _____
_____ BTEX > 915-1 _____
_____ Vertical Extent > 915-1 (in feet) _____

Groundwater

Number of groundwater samples collected 14
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 10
Number of groundwater monitoring wells installed 14
Number of groundwater samples exceeding 915-1 3

-- _____ Highest concentration of Benzene (µg/l) 11
ND _____ Highest concentration of Toluene (µg/l) _____
-- _____ Highest concentration of Ethylbenzene (µg/l) 1100
-- _____ Highest concentration of Xylene (µg/l) 7700
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) 900 Volume of liquid waste (barrels) 0

Is further site investigation required?

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.

Approximately 900 CYDS of impacted material was removed and transported to Buffalo Ridge Landfill in Keenesburg, Colorado for disposal under PDC waste manifests. The excavation measured approximately 62 feet by 39 feet by 10 feet bgs. Excavation oversight soil screening and sampling performed by LTE; however, due to an internal oversight, no data was submitted to the ECMC. Groundwater was encountered in the excavation at approximately 14 feet bgs.

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.

Enhanced fluid recovery (EFR) and air sparge (AS) was initiated during the third quarter 2018 and will continue as the selected remediation strategy through the second quarter 2024. A summary of EFR/AS operational data is provided in Table 3.

Soil Remediation Summary

In Situ

Ex Situ

Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Air sparge / Soil vapor extraction
 Natural Attenuation
 Other _____

Excavate and offsite disposal
 If Yes: Estimated Volume (Cubic Yards) _____
 Name of Licensed Disposal Facility or COGCC Facility ID # _____
 Excavate and onsite remediation
 Land Treatment
 Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Other _____

Groundwater Remediation Summary

Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Yes Air sparge / Soil vapor extraction
 Natural Attenuation
 Yes Other Enhanced Fluid Recovery (EFR) _____

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 semi-annual basis at the 11 site monitoring wells (MW02-R, MW03-R, MW05-R, MW07, MW10-R, MW13, MW17-R, MW19, MW21, MW23, and MW24). 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, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C in accordance with Table 915-1. During the fourth quarter 2024, monitoring well MW07 was unable to be located and is presumed destroyed. Additionally, monitoring wells MW13 and MW17-R were obstructed and no samples were collected from these monitoring wells during the fourth quarter 2023.

Fourth quarter 2023 analytical results indicated that organic constituent concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring wells MW03-R, MW05-R, MW10-R, MW21, and MW23. Organic concentrations were in compliance with the applicable regulatory standards in the remaining three sampled monitoring well locations. Additionally, fourth quarter 2023 analytical results indicated that inorganic parameters were in compliance with the applicable ECMC Table 915-1 regulatory standards or within 1.25x the background concentrations of the up-gradient monitoring well (MW19) in all sampled monitoring well locations. Semi-annual groundwater sampling will continue in the second quarter 2024.

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.

Financial assurance information was included in the second quarter 2023 Supplemental Form 27 (Document No. 403464102). 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: \$ 35000 _____

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: _____

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 tank battery decommissioning activities, the excavation was backfilled, compacted, and recontoured to match pre-existing conditions. The location will be reclaimed in accordance with the ECMC 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. 08/03/2019

Proposed date of completion of Reclamation. 12/23/2031

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. 11/25/2009

Actual Spill or Release date, or date of discovery. 11/24/2009

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____

Proposed site investigation commencement. 11/24/2009

Proposed completion of site investigation. 01/27/2016

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/08/2015

Proposed date of completion of Remediation. 12/23/2031

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 semi-annual groundwater monitoring and monthly remediation activities at the former Dechant 1-31A location for the fourth quarter 2023.

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: 12/22/2023

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: BOB CHESSON

Date: 12/27/2023

Remediation Project Number: 9365

COA Type**Description**

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**

403635120	FORM 27-SUPPLEMENTAL-SUBMITTED
403635162	MONITORING REPORT

Total Attach: 2 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)