

State of Colorado  
Energy & Carbon Management Commission

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Report taken by:  
Chris Sanchez

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 Phone: <u>(970) 313-5582</u> Mobile: <u>( )</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>ENspillremediationcontractor@pdce.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32028 Initial Form 27 Document #: 403546839

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>LOCATION</u>	Facility ID: <u>327089</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>LEE-64N65W 5NWNW</u>	Latitude: <u>40.346655</u>	Longitude: <u>-104.693509</u>	
** correct Lat/Long if needed: Latitude: <u>40.346655</u>		Longitude: <u>-104.693509</u>	
QtrQtr: <u>NWNW</u>	Sec: <u>5</u>	Twp: <u>4N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Residential  
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No  
Is groundwater less than 20 feet below ground surface? Yes

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

Closest Domestic Well within quarter mile – 1140' NNW  
Additional Domestic Wells – None within a quarter mile  
Nearest Surface Water – None within a quarter mile  
Nearest Occupied Building – Residential building 250' N  
Additional Occupied Buildings – Residential buildings 785' W, 700' NW, 895' SW

No other potential receptors are located within ¼ mile of the Site.  
Above distances are approximations.

# 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 checked="" 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
No	GROUNDWATER	Not impacted	Not encountered
Yes	SOILS	182' square x 5' deep	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.

In accordance with ECMC Rule 911, this Form serves as notification for the decommissioning and abandonment of the Lee 1-5 production facility. The ground and sub-surfaces will be visually inspected for hydrocarbon impacts during equipment decommissioning. In addition, on-site dump lines located between the separator and tank battery will be removed by pulling from either end during decommissioning activities. Field observations and photo documentation will be recorded in a field inspection form for submittal to the ECMC.

## 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 ):

Grab soil samples will be collected below and/or adjacent to applicable facility equipment, as defined in the Rule 911.a.(4) guidance document (9/20/21), for field screening purposes. Discrete soil samples will be collected for laboratory analysis either in any area of observed hydrocarbon impacts, or in the sample locations designated by the ECMC. Soil samples will be submitted for laboratory analysis of the full Table 915-1 analytical suite by ECMC approved methods. See the attached Figure 1 for an illustration of the facility layout and proposed soil sample locations.

### Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260.

### 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 ):

If a produced water vessel is present, discrete soil samples will be collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. The soil samples will be submitted for laboratory analysis of the full Table 915-1 analytical suite by ECMC approved methods. Assessment of the off location flowline will be addressed with its respective wellhead under a separate Form 27.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 5 -- Highest concentration of TPH (mg/kg) 1340  
 Number of soil samples exceeding 915-1 4 -- Highest concentration of SAR 0.316  
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 Yes  
 Approximate areal extent (square feet) 182 Vertical Extent > 915-1 (in feet) 5

**Groundwater**

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l) \_\_\_\_\_  
 Was extent of groundwater contaminated delineated? No Highest concentration of Toluene (µg/l) \_\_\_\_\_  
 Depth to groundwater (below ground surface, in feet) \_\_\_\_\_ Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
 Number of groundwater monitoring wells installed \_\_\_\_\_ Highest concentration of Xylene (µg/l) \_\_\_\_\_  
 Number of groundwater samples exceeding 915-1 \_\_\_\_\_ 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?  
 Three site-specific background samples were collected from 3 background soil borings (BKG05 through BKG07) from approximately 5 ft-bgs in areas away from oil and gas infrastructure and were submitted for analysis of arsenic, lead, EC, pH, and SAR by ECMC approved methods.

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?  
 \_\_\_\_\_

**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.  
 During facility closure activities, hydrocarbon impacted soils were discovered at the former partially buried produced water vessel. The historic release was reported in Form 19 document number 403644729. A total of approximately 20 cubic yards of impacted soil was removed and hauled to Waste Management's North Weld Landfill in Ault, CO in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

**REMEDICATION 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.  
 The remaining impacted soil will be removed and hauled to a permitted disposal facility.  
 Please refer to the Operator Comments section of this Form 27 for additional discussion.

**Soil Remediation Summary**

In Situ  Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation ) Yes \_\_\_\_\_ Excavate and offsite disposal  
 \_\_\_\_\_ Chemical oxidation If Yes: Estimated Volume (Cubic Yards) 20  
 \_\_\_\_\_ Air sparge / Soil vapor extraction Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_ Natural Attenuation  
\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_ Excavate and onsite remediation  
\_\_\_\_ 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.

Groundwater was not encountered during initial decommissioning nor during excavation activities.

# 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 Site Investigation and Remediation Progress Report

## 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.

Operator does not have site-specific financial assurance for this project; however, Operator has inactive well, blanket, and surface bonding including Surety IDs 106077122, 106473808, and 106473820, as well as commercial general liability and/or umbrella/excess insurance meeting the requirements of Rule 705.b. Operator does not anticipate making an insurance claim for this project.

- Source mass removal is ongoing.
- PDC is requesting a reduced analyte list for additional soil sampling activities at the northern most excavation to include BTEXN, TMBs, TPH, fluoranthene, 1-methylnaphthalene, 2-methylnaphthalene, pyrene, and arsenic.

Costs included herein are estimates only and may change over time based on numerous factors. Accordingly, Operator makes no guarantees as to the accuracy of such cost estimates, thus providing an estimate for the next year below.

Operator anticipates the remaining cost for this project to be: \$ 55000

## 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 20

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Waste Management's North Weld Landfill, Ault, CO

Volume of E&P Waste (liquid) in barrels 0

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.

Reclamation will be conducted in accordance with ECMC 1004 Series Rules.

Is the described reclamation complete? \_\_\_\_\_

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. 09/27/2024

Proposed date of completion of Reclamation. 09/27/2025

## 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. 08/28/2023

Actual Spill or Release date, or date of discovery. 01/04/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/02/2024

Proposed site investigation commencement. 01/02/2024

Proposed completion of site investigation. 06/28/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/03/2024

Proposed date of completion of Remediation. 06/28/2024

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 serves as a reduced analyte request for excavation occurring at the former Lee 1-5 partially buried produced water vessel. Waste characterization soil sample WC01@5 was collected from approximately 5 ft-bgs from impacted material and submitted for analysis for the full Table 915 -1 suite of analytes. Analytical results for WC01@5 reported benzene, ethylbenzene, naphthalene, 1,2,4-TMB, TPH, and arsenic above their respective Table 915-1 GWSSLs. There were also detections of total xylenes, fluoranthene, and pyrene.

Three site-specific background samples were collected from 3 background soil borings (BKG05 through BKG07) from approximately 5 ft-bgs in areas away from oil and gas infrastructure and were submitted for analysis of arsenic, lead, EC, pH, and SAR by ECMC approved methods. Analytical results for all facility closure confirmation samples submitted for analysis are compliant with Table 915-1 GWSSLs except for confirmation soil samples collected from the sidewall of the separator dump line riser excavation (EX02@3), from adjacent to the separator flowline riser (SEP01-FL@4) and from beneath the access hatch of the above ground storage tank (AST01@1) which reported arsenic above 1.25x the average background concentration for arsenic (0.588 mg/kg). Analytical results for confirmation soil sample (EX01@6) collected from the floor of the separator dump line riser excavation reported arsenic (0.385 mg/kg) below 1.25x the average background concentration for arsenic.

Therefore, PDC respectfully requests a reduced analyte list for additional soil sampling activities at the facility to include BTEXN, TMBs, TPH, fluoranthene, 1- methyl-naphthalene, 2-methyl-naphthalene, pyrene, and arsenic.

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

Signed: Jason Davidson

Title: Senior Env. Specialist

Submit Date: 01/30/2024

Email: ENspillremediationcontractor@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: Chris Sanchez

Date: 02/02/2024

Remediation Project Number: 32028

## COA Type

## Description

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area
	If encountered operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds
2 COAs	

## 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
403670510	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403670538	ANALYTICAL RESULTS
403670539	ANALYTICAL RESULTS
403670540	ANALYTICAL RESULTS
403670541	SITE MAP
403670543	SOIL SAMPLE LOCATION MAP
403670544	ANALYTICAL RESULTS
403675692	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC approves a reduced analyte list	02/01/2024

Total: 1 comment(s)