

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203

Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403687194

Receive Date:

Report taken by:

## 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: PDC ENERGY INC	Operator No: 69175	Phone Numbers
Address: 1099 18TH STREET SUITE 1500		Phone: (303) 596-5693
City: DENVER	State: CO	Zip: 80202
Contact Person: Jason Davidson	Email: ENspillremediationcontractor@pdce.com	Mobile: ( )

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 33383 Initial Form 27 Document #: 403603783

## 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

Yes Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 001-08351	County Name: ADAMS
Facility Name: BOX ELDER FARMS 1	Latitude: 39.954876	Longitude: -104.653739	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 22	Twp: 1S	Range: 65W Meridian: 6 Sensitive Area? Yes

  

Facility Type: LOCATION	Facility ID: 320186	API #: _____	County Name: ADAMS
Facility Name: GREAT WESTERN BOX ELDER FARMS 1	Latitude: 39.954850	Longitude: -104.653744	
** correct Lat/Long if needed: Latitude: 39.954888		Longitude: -104.654138	
QtrQtr: NENW	Sec: 22	Twp: 1S	Range: 65W Meridian: 6 Sensitive Area? Yes

## **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? No

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

Closest Domestic Well within quarter mile – 1,265' NW

Additional Domestic Wells – 1,250' S

Nearest Surface Water – None

Nearest Occupied Building – 570' NNE

Additional Occupied Buildings – 915' NW, 1,110' SSE, 1,110' SSW

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

Above distances are approximations.

## 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
UNDETERMINED	GROUNDWATER	TBD	Not yet determined
Yes	SOILS	TBD	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 ECOM Rule 911, this form serves as notification for the decommissioning and abandonment of the Box Elder 1 production facility, Box Elder 1 wellhead, and removal of the associated flowline. 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 ECOM.

### 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 ):

Soil samples will be collected from the surface in cardinal directions of the wellhead and 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 ECOM. Soil samples will be collected at the tank battery, and adjacent to the wellhead from native material and will be submitted for laboratory analysis of the full Table 915-1 analytical suite by ECOM 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, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

#### 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 and submitted for laboratory analysis of the full Table 915-1 analytical suite. Assessments will be conducted during the removal of the on-location flowline (~150 feet in length) and soil samples will be collected below the flowline risers. The flowline and adjacent sub-surface will be inspected for visual and olfactory indicators of potential failure and hydrocarbon impacts. Soils will be field screened below the flowline and if suspected impacts are observed, a soil sample will be collected and submitted for analysis of the full Table 915-1 analytical suite.

## SITE INVESTIGATION REPORT

## **SAMPLE SUMMARY**

### **Soil**

Number of soil samples collected 7

Number of soil samples exceeding 915-1 6

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

Approximate areal extent (square feet) 10

### **Groundwater**

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

### **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.

### **NA / ND**

-- Highest concentration of TPH (mg/kg) 370

-- Highest concentration of SAR 1.22

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

Highest concentration of Benzene (µg/l)

Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

Highest concentration of Xylene (µg/l)

Highest concentration of Methane (mg/l)

## **OTHER INVESTIGATION INFORMATION**

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

Twelve background samples were collected from approximately 4 ft., 6 ft., and 8 ft-bgs from 4 soil borings (BKG01-BKG04) in areas away from oil and gas infrastructure and were submitted for analysis of pH, arsenic, and barium 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.

One facility closure confirmation soil sample (FLR01@4) collected from adjacent to the wellhead flowline riser reported benzo(a)anthracene slightly above the Table 915-1 GWSSL, and two facility closure confirmation soil samples (SEP01-DL@4 and AST01@1) collected from adjacent to the separator dump line and beneath the access hatch of the AST reported pH levels below the Table 915-1 GWSSL. The historic release was reported in Form 19 document number 403669853.

## **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.

The 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 )  
\_\_\_\_\_ 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  
\_\_\_\_\_ 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.

- Assessment activities as outlined herein are proposed.  
- PDC is requesting a reduced analyte list for additional soil sampling activities to include BTEXN, TMBs, TPH, Table 915-1 PAHs excluding 1-methylnaphthalene and 2-methylnaphthalene, and pH.

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: \$ 75000

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation?

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.

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. \_\_\_\_\_

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. 11/08/2023

Actual Spill or Release date, or date of discovery. 01/29/2024

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 01/11/2024

Proposed site investigation commencement. 01/11/2024

Proposed completion of site investigation. 07/11/2024

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 01/11/2024

Proposed date of completion of Remediation. 01/11/2025

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 Box Elder Farms 1 wellhead and former separator and AST and the Box Elder Farms 1 production facility. One facility closure confirmation soil sample (FLR01@4) collected from adjacent to the wellhead flowline riser reported benzo(a)anthracene slightly above the Table 915-1 GWSSL. There were also detections of all Table 915-1 polycyclic aromatic hydrocarbons (PAHs) excluding 1-methylnaphthalene and 2-methylnaphthalene.

Twelve background samples were collected from approximately 4 ft., 6 ft., and 8 ft-bgs from 4 soil borings (BKG01-BKG04) in areas away from oil and gas infrastructure and were submitted for analysis of pH, arsenic, and barium by ECMC approved methods. Analytical results for all facility closure confirmation soil samples submitted for analysis are compliant with Table 915-1 GWSSLs except for pH in confirmation soil samples collected at the wellhead (WH01@8), adjacent to the separator dump line (SEP01-DL@4), at the partially buried produced water vessel (PWV01@5 and WDL01@4), and from beneath the access hatch at the AST (AST01@1). Analytical results for all confirmation soil samples collected reported arsenic below 1.25x the highest background concentration for arsenic (1.23 mg/kg) and analytical results for confirmation soil samples WH01@8 and PWV01@5 reported barium below 1.25x the highest background concentration for barium (135 mg/kg).

Therefore, PDC respectfully requests a reduced analyte list for additional soil sampling activities at the facility to include BTEXN, TMBs, TPH, Table 915-1 PAHs excluding 1-methylnaphthalene and 2-methylnaphthalene, and pH.

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

Signed: Jason Davidson

Title: Remediation Advisor

Submit Date: \_\_\_\_\_

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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 33383

### 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

403687232	ANALYTICAL RESULTS
403687233	SITE MAP
403687235	ANALYTICAL RESULTS
403687238	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

## General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)