

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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## 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 ECMC 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: 2331 CITYWEST BLVD., S812-02		Phone: (303) 619-3042
City: HOUSTON	State: TX	Zip: 77042
Contact Person: Steve Weathers	Email: stephen.weathers@p66.com	Mobile: (303) 619-3042

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 9353 Initial Form 27 Document #: 200437992

## 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: First Quarter 2024 Groundwater Monitoring Summary Report

## SITE INFORMATION

No Multiple Facilities

Facility Type: GAS COMPRESSOR STATION	Facility ID: 422082	API #:	County Name: WELD
Facility Name: TAMPA COMPRESSOR STATION	Latitude: 40.176300	Longitude: -104.489400	
	** correct Lat/Long if needed: Latitude: 40.176587	Longitude: -104.489836	
QtrQtr: SW	Sec: 31	Twp: 3N	Range: 63W
	Meridian: 6	Sensitive Area?	No

## SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use PASTURE

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

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

Livestock and domestic wells located 1/4 mile of release.

## 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) Petroleum hydrocarbon impacted groundwater

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	See Approved F27S Report & Figures	Groundwater sampling
No	SOILS	See Approved F27S Report & Figures	Lab 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.

Initial actions and completed remedial measures have previously been submitted to the ECMC in the Form 19 Initial (Document #400785370) dated February 3, 2015, Form 19 Supplemental (Document #40078873 and #400930163) dated February 10 and November 11, 2015. A Form 27 Site Investigation and Remediation Work Plan (Document #400927294) approved November 18, 2015, was issued to the ECMC and detailed completed excavation activities and the installation of monitoring well locations to further delineate the extent of impacts to groundwater. The ECMC issued Spill tracking facility ID# 440770 and remediation project #9353 for the Site. Previous remediation efforts have included excavation of impacted soils, installation of 12 monitoring well locations, and vacuum enhanced fluid recovery (EFR) remediation activities. Ongoing groundwater monitoring is being performed at the Site on a quarterly basis and summarized in approved Form 27-S workplans. Details of the first quarter 2024 (1Q24) groundwater monitoring event are provided within this Form 27 submittal.

### 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 ):

Based on the information presented in the approved F27S (#402591732), further soil sampling and investigation is not anticipated at this time.

#### Proposed Groundwater Sampling

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

Twelve (12) groundwater monitoring wells were installed at the Site to monitor dissolved phase total petroleum hydrocarbon impacts to groundwater. Ongoing quarterly groundwater monitoring is being performed at the Site at well locations illustrated on the attached Figure 2. The first quarter groundwater monitoring event was conducted on February 14, 2024. Groundwater samples are submitted for laboratory analysis, and groundwater monitoring will continue until analytical results demonstrate concentrations below ECMC Table 915-1 standards for four consecutive quarterly monitoring events, at which time a no further action (NFA) determination for the Site will be requested from the ECMC.

#### 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 ):

## SITE INVESTIGATION REPORT

## **SAMPLE SUMMARY**

### **Soil**

Number of soil samples collected 0

Number of soil samples exceeding 915-1 0

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

Approximate areal extent (square feet) 700

### **NA / ND**

NA Highest concentration of TPH (mg/kg)           

NA Highest concentration of SAR           

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 10

### **Groundwater**

Number of groundwater samples collected 12

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 9

Number of groundwater monitoring wells installed 12

Number of groundwater samples exceeding 915-1 4

-- Highest concentration of Benzene (µg/l) 17.7

-- Highest concentration of Toluene (µg/l) 1.54

-- Highest concentration of Ethylbenzene (µg/l) 584

-- Highest concentration of Xylene (µg/l) 2050

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)            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.

As previously reported in the Form 27 Remediation Work Plan, initial source remediation efforts performed February 2, 2015, removed surface-stained soils via Hydrovac excavation methods. Between May 6 and 22, 2015 an additional 210 cubic yards of impacted soil and 33 bbls of groundwater were removed from the Site. In the northwest corner of the Site, in-situ remediation activities were performed to address impacts to soils within the vadose zone that was inaccessible due to facility infrastructure. Twelve monitoring wells have been installed to delineate petroleum hydrocarbon impacts to groundwater. Between April 28, 2015, and May 17, 2017, regular EFR remediation activities were performed removing approximately 1,188 bbls of additional impacted groundwater from the Site. As presented in the approved F27S (#402656483), the building demolition and soil remediation activities performed between 8/21/2020 and 9/30/2020 removed approximately 1,176 cubic yards (cy) of impacted material for off-site disposal. In addition, and per the landowner's request, soil material and overburden that is below the ECMC standards but exhibited discoloration was removed from the site during the third quarter 2021 and backfilled per landowner specifications.

## **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.

In addition to the source removal remediation activities described above, air sparge (AS) and soil vapor extraction (SVE) activities were performed at the Site between August 29, 2017 and February 7, 2018. Active remedial efforts were discontinued to evaluate subsurface conditions without the influence of active remediation. Ongoing groundwater monitoring has been performed at the Site on a quarterly basis through February 2024 and will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below ECMC Table 915-1 standards. At that time, an NFA determination for the Site will be requested from the ECMC. First quarter 2024 groundwater monitoring activities are further described in the following Groundwater Monitoring section.

## Soil Remediation Summary

☐ In Situ

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

☐ Ex Situ

\_\_\_\_\_ 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.

Site-wide groundwater sampling is conducted on a quarterly basis at the 12 monitoring well locations illustrated on the attached Figure 2. During the 1Q24 monitoring event, performed on February 14, 2024, groundwater levels and samples were collected from all 12 well locations using standard hand-bailing sampling methods, and were submitted to Pace Analytical Laboratory for analysis of Table 915-1 organic parameters using USEPA method 8260D. Groundwater elevations and flow trends are presented in Table 1 and illustrated in Figure 3. First quarter 2024 laboratory analytical data is summarized in Table 2 and on Figure 4, historical groundwater data is summarized in Table 3, and the laboratory analytical report is attached as Appendix A. During the 1Q24, concentrations of benzene; total xylenes; and/or 1,2,4-trimethylbenzene (TMB) were observed above the ECMC Table 915-1 standards at four well locations (BH04, BH05, BH06, and BH11). Ongoing groundwater monitoring will continue to be performed on a routine basis until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below ECMC Table 915-1 standards.

## 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 has sufficient insurance to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. DCP currently has \$5,000,000 in general liability insurance. 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: \$ 40000

### 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

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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? No

Is additional groundwater monitoring to be conducted? Yes

Operator shall comply with the ECMC 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.

Groundwater impacts and monitoring are associated with an inactive former compressor station. Following the completion of onsite decommissioning activities in 2020, the ECMC approved Form 27S (#402591732). DCP continues to work with the landowner and an access road for remaining oil and gas infrastructure has been completed with landowner approval and the area has been backfilled, regraded, and reseeded with landowner and ECMC approval. No further reclamation activities are planned at this time.

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. \_\_\_\_\_

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

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

Proposed site investigation commencement. 02/02/2015

Proposed completion of site investigation. 12/31/2024

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 02/06/2015

Proposed date of completion of Remediation. 12/31/2024

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**

DCP will continue to complete quarterly groundwater monitoring, and the details will be presented to the ECMC in subsequent Form 27-S reports. With ECMC approval of the site-specific groundwater analysis (#402656483), DCP will continue the groundwater monitoring of organic parameters listed in Table 915-1 on a quarterly basis and will comply with this Site-Specific Groundwater Sampling and Analysis Plan during each quarterly event.

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

Signed: Steve Weathers

Title: Program Manager

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

Email: ECMCNotification@p66.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: \_\_\_\_\_

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

Remediation Project Number: 9353

**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**

403745395	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)