

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Report taken by:

Taylor Robinson

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: PDC ENERGY INC	Operator No: 69175	Phone Numbers Phone: (303) 860-5800 Mobile: ()
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO Zip: 80202	
Contact Person: Karen Olson	Email: taspillremediationcontractor@pdce.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21296 Initial Form 27 Document #: 402888756

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: LOCATION	Facility ID: 467698	API #: _____	County Name: WELD
Facility Name: NYC N-65N67W 24SESE		Latitude: 40.378098	Longitude: -104.839404
		** correct Lat/Long if needed: Latitude: 40.378011	Longitude: -104.838922
QtrQtr: SWSE	Sec: 24	Twp: 5N	Range: 6W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agricultural

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Surface Water: Possible Surface Draw - 1,040' SW; FWS Wetlands: 1,040' WNW Riverine (R4SBC).

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
Yes	SOILS	Refer to Figures 1-5, Tables 1-4	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.

On March 7, 2022, field screening and confirmation soil sampling was conducted in accordance with the ECMC Rule 911 during the decommissioning and closure of the Booth 25-32 Tank Battery. Based on initial results, it was determined that a historic release was discovered below the former produced water vessel (PWV). Following the discovery, mitigation activities were initiated to delineate and remove remaining hydrocarbon impacts. Approximately 8,349 cubic yards (CY) of impacted material were removed under a stamped Engineered Excavation Plan and transported to the North Weld Waste Management Facility for disposal under PDC manifests. On March 7, 2022, one (1) soil sample (PWV01-NW-B) was collected from impacted source material adjacent to and below the PWV at approximately 9 feet bgs. The sample was submitted for laboratory analysis of the full ECMC Table 915-1 analyte suite. Laboratory analytical results from the PWV source area indicated COCs include BTEX, 1,2,4-TMB, 1,3,5 TMB, naphthalene, TPH (C6-C36), chrysene, fluorene, pyrene, 1-M, and 2-M. On April 18, 2022, one (1) soil sample (SS01) was collected from the base of the excavation at a depth of approximately 22 feet bgs and submitted for laboratory analysis of the above referenced COC's. Final analytical results for the soil sample collected from the base of the excavation indicate that organic concentrations were in exceedance of the applicable ECMC Table 915-1 Protection of Groundwater SSLs in SS01.

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):

Between March 7, 2023, & April 7, 2023, 151 soil samples (SS02-SS09, SS11-SS77, SS80-SS95, SS97-SS147 & SS150-SS151) were collected from the base & sidewalls of the engineered excavation & submitted for analysis for the above mentioned COCs. Soil Samples (SS10, SS78, SS79, SS96, SS148 & SS149) were collected from approximately 2.5 feet bgs & submitted for laboratory analysis of pH, EC, SAR, & boron. Analytical results indicated that organic compounds were in compliance of the applicable ECMC Table 915-1 standards in the soil samples collected from the base & sidewalls of the excavation extent. Additionally, EC was observed in exceedance of the applicable standards in soil sample SS149 @ 2.5' bgs. On June 2, 2023, 4 soil borings (SB09-SB12) were advanced to vertically & horizontally delineate the EC exceedance observed in soil sample SS149. Analytical results indicated that EC was in compliance with the applicable standards and were unable to reproduce the elevated EC value.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 193

Number of soil samples exceeding 915-1 16

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

Approximate areal extent (square feet) 13060

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

NA / ND

-- Highest concentration of TPH (mg/kg) 4190

-- Highest concentration of SAR 2.62

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 22

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)

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?

On March 7, 2022, three (3) background soil samples (BKG01) were collected at approximately 1 foot, 2.5 feet, and 4 feet bgs from native material topographically up-gradient of the tank battery. All background soil samples were submitted for analysis of ECMC Table 915-1 metals. Analytical results indicated that arsenic, barium, and selenium were in exceedance of the applicable regulatory standards in native soil. Based on these results, arsenic and selenium exceedances observed in soil sample PWV01-NW-B are within 1.25x the background concentrations and indicative of native soil conditions, as referenced in footnote 11 of the Table 915-1.

On June 2, 2023, sixteen (16) background soil samples (BKG02-BKG05) were collected at approximately 2.5 feet, 4 feet, 5 feet, and 6 feet bgs from native material and submitted for laboratory analysis of EC. Analytical results indicated that EC was in compliance with the applicable standard in native material.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 8790

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.

Between March 7 and April 18, 2022, approximately 179 CY of impacted material were excavated below and adjacent to the former PWV and transported to the North Weld Waste Management Facility in Ault, CO for disposal under PDC waste manifests.

Supplemental source mass removal activities were conducted between March 7, 2023 and April 7, 2023. Approximately 8,611 CY were removed via mechanical excavation and transported to the North Weld Waste Management facility in Ault, Colorado for disposal under PDC waste manifests.

REMEDIAL ACTION 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.

EC concentrations originally observed in soil sample SS149@2.5' were vertically and horizontally delineated through the advancement of soil borings SB09 - SB12. Additionally, re-sampling of soils directly adjacent to the original exceedance indicated the EC exceedance could not be replicated. Supporting documentation was included in the previously submitted Supplemental Form 27 Document No. 403430695.

Confirmation soil sample locations are detailed in Figures 1-5. Analytical results are detailed in Attachment A. Field notes are detailed in Attachment B. Soil boring logs are detailed in Attachment C. A detailed reclamation plan is included as Attachment D.

Soil Remediation Summary

☐ In Situ

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

☒ Ex Situ

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 8790
_____ Name of Licensed Disposal Facility or ECMC 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, confirmation sampling activities, excavation activities, or supplemental site investigation 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

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.

- The project has been completed and no further assessment or remediation is required at this time.
- Facility and infrastructure were decommissioned and the location will be reclaimed in accordance with the ECMC 1000 Series.

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: \$

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:

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? ☒ Yes

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? No

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted? _____

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.

Following supplemental source mass activities, the location was backfilled, compacted, and re-contoured to match pre-existing agricultural conditions. The location will be reclaimed in accordance with the ECMC 1000 series. Based on analytical results collected during supplemental site investigation activities, the elevated EC levels recorded during excavation and confirmation sampling activities were successfully delineated and could not be replicated. Please refer to the attached detailed reclamation plan to address the EC levels recorded during site investigation activities.

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. 03/07/2022

Proposed date of completion of Reclamation. 04/03/2025

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. 03/02/2021

Actual Spill or Release date, or date of discovery. 03/07/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/27/2021

Proposed site investigation commencement. 06/02/2023

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/06/2023

Proposed date of completion of Remediation. 06/02/2023

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:

No additional investigation is required at this time. The proposed completion of remediation date has been adjusted to the supplemental site investigation completion date.

OPERATOR COMMENT

This Supplemental Form 27 was submitted to summarize the evaluation of the EC analytical results following the site investigation conducted in June of 2023 at the former Booth 25-32 Tank Battery location.

Soil analytical results received for soil samples (SB09-SB12) collected during supplemental site investigation and delineation activities indicated that EC levels were delineated to below the ECMC Table 915-1 Soil Suitability for Reclamation Standard. Additionally, the original exceedance observed in confirmation soil sample SS149@2.5' could not be replicated and is determined to be a discrete location. Please refer to the attached detailed reclamation plan to address the EC levels recorded during site investigation activities.

PDC acknowledges the inclusion of a reclamation plan differs from the proposed path forward as detailed in the previously submitted and approved SF27, submitted under ECMC Document No. 403684198. However, after further review, the attached reclamation plan details that there will be no long-term impacts to the Site and surrounding agricultural production as result of the EC level previously observed on-site.

Following review and approval of the reclamation plan, PDC requests a No Further Action determination for the former Booth 25-32 Tank Battery location and remediation project number 21296.

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

Signed: Karen Olson

Title: Remediation Advisor

Submit Date: 04/04/2024

Email: taspillremediationcontractor@pdce.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: Taylor Robinson

Date: 05/23/2024

Remediation Project Number: 21296

COA Type

Description

	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
	This no further action determination is contingent on implementation of the approved reclamation plan.
2 COAs	

ATTACHMENT 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

403741259	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403742710	SOIL SAMPLE LOCATION MAP
403742712	ANALYTICAL RESULTS
403742717	PHOTO DOCUMENTATION
403742719	LOGS
403742720	RECLAMATION PLAN
403801983	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Reclamation Specialist	The submitted results in the attached Reclamation Plan were sufficient for ECMC Staff to make a proper assessment about leaving exceedances of inorganics in-situ. Soil sample analytical results indicate EC exceeds the allowable level for Table 915-1 soil suitability for reclamation at a depth of 2.5 feet bgs. Approximately 75% of corn plant roots occupy the top two feet; therefore, the limited area and depth of EC should not negatively affect plant growth. No further action is necessary at this time. However, should future conditions at the site indicate poor growth that is not reflective of reference areas, then further investigation and reclamation activities may be required.	05/23/2024

Total: 1 comment(s)