

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

403563331

Receive Date:

04/30/2024

Report taken by:

RICK ALLISON

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 ECOM 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: (970) 313-5582
City: DENVER	State: CO	Zip: 80202
Contact Person: Jason Davidson	Email: ENspillremediationcontractor@pdce.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24760 Initial Form 27 Document #: 403145274

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 #: 123-26198	County Name: WELD
Facility Name: GREAT WESTERN 26-44	Latitude: 40.452560	Longitude: -104.857280	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 26	Twp: 6N	Range: 67W
Meridian: 6	Sensitive Area? Yes		

Facility Type: WELL	Facility ID: _____	API #: 123-26339	County Name: WELD
Facility Name: GREAT WESTERN 35-31	Latitude: 40.452530	Longitude: -104.857420	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 26	Twp: 6N	Range: 67W
Meridian: 6	Sensitive Area? Yes		

Facility Type: WELL	Facility ID: _____	API #: 123-26338	County Name: WELD
Facility Name: GREAT WESTERN 35-41		Latitude: 40.452560	Longitude: -104.857360
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 26	Twp: 6N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 333241	API #: _____	County Name: WELD
Facility Name: MERSHON-66N67W 26SWSE		Latitude: 40.452920	Longitude: -104.857360
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 26	Twp: 6N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 333258	API #: _____	County Name: WELD
Facility Name: GREAT WESTERN-66N67W 26SWSE		Latitude: 40.452530	Longitude: -104.857420
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 26	Twp: 6N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 439123	API #: _____	County Name: WELD
Facility Name: SPILL/RELEASE POINT		Latitude: 40.453085	Longitude: -104.857716
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 26	Twp: 6N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL _____ 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? Yes _____

Other Potential Receptors within 1/4 mile

The Mershon/Pad 1 Production Facility and Great Western 35-31, Great Western 35-41 and Great Western 26-44 wellheads are surrounded by vacant fields in all directions. There is one residence approximately 0.25 miles southeast for the Site. One unnamed ditch is mapped approximately 0.20 miles west of the Site and is tributary to the Cache La Poudre River. The Site is located within the 100-year Effective (2020) Floodplain buffer. There are no domestic water wells permitted within a quarter mile of the Site. Based on data from monitoring wells installed at the Site, groundwater is expected to be encountered at approximately 14 feet below ground surface (bgs). There are no additional sensitive areas, wetlands, or wildlife habitats identified within a quarter mile of the Site.

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
No	GROUNDWATER	Not impacted	Grab Groundwater Sampling
Yes	SOILS	11,618 square feet x 14 feet 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.

PDC proposes to conduct closure of the Great Western 35-31, Great Western 35-41 and Great Western 26-44 wellheads, and related production facility (Mershon/Pad 1). The production facility includes seven above ground storage tanks, two separators one partially buried produced water vessel, one ECD and three wellheads. PDC will conduct site investigation activities, field screening, and confirmation soil sampling activities during closure in accordance with ECOM 900 Series Rules. Discrete soil samples will be collected and analyzed pursuant to Rule 915, following the general sample collection guidance in Rule 915.e.(2). All waste generated during the closure activities will be managed and disposed of in accordance with Rules 905 and 906.

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):

During production facility closure activities, at least 14 discrete soil samples will be collected for field screening only and at least 19 discrete soil samples will be collected for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene and gasoline range organics (GRO) [C6-C10] by EPA Method 8260B and for diesel range organics (DRO) [C10-C28] and residual range organics (RRO) [C28-C36] by EPA Method 8015. Analytical results for GRO, DRO, and RRO will be added together to calculate total petroleum hydrocarbons (TPH). Wellhead sidewall (flowline riser) samples and produced water vessel floor samples will also be submitted for analysis of Soil Suitability Parameters pH, EC, and SAR by Saturated Paste Extraction Methods, and boron by EPA Method 6020B Hot Water Soluble Extraction Methods. See the attached Figure 1 for an illustration of the facility layout and proposed discrete 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 8260B.

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):

Assessment will be conducted during the removal of the on-location flowlines (estimated to be approximately 120 feet in length each) and soil samples will be collected below the flowline risers. Approximately 1200' of the off-location sales line will be removed as shown on Figure 2. The flowlines, off location sales line, and adjacent sub-surface will be inspected for any visual and olfactory indicators of potential failure and hydrocarbon impacts. Soils will be field screened below the flowlines and if suspected impacts are observed, a soil sample will be collected for an initial assessment and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, and TPH (C6-C36) by the same methods discussed above.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 126

Number of soil samples exceeding 915-1 8

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

Approximate areal extent (square feet) 11618

NA / ND

-- Highest concentration of TPH (mg/kg) 3580

-- Highest concentration of SAR 25.7

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 14

Groundwater

Number of groundwater samples collected 3

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 14

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

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?

Four background samples were collected with a hand auger from location BKG01 during initial facility closure activities in September 2022 and were submitted for analysis of EC, SAR, and pH by Saturated Paste Extraction Methods, boron by EPA Method 6020B Hot Water Soluble Extraction Method, and arsenic, barium and selenium by EPA Method 6020B. Thirty additional background samples were collected from 10 soil borings (BKG01-BKG11) in September 2023. Samples were collected from the 5-7 ft-bgs, 10-12 ft-bgs and 13-15 ft-bgs intervals and submitted for analysis of arsenic and barium by EPA Method 6020B.

☐ 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.

Between October 4 and October 21, 2022, approximately 5,930 cubic yards of impacted soil was excavated and hauled offsite for disposal under PDC manifest to Waste Management's North Weld Landfill in Ault, Colorado in accordance with Rules 905 and 906. Copies of the waste disposal 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.

Please refer to the Source Removal section above and to the Groundwater Monitoring section below.

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) _____ 5930
_____ 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 encountered at approximately 14 ft-bgs in Excavation 1 and a grab groundwater sample was collected on October 4, 2022.
Groundwater was encountered at approximately 14 ft-bgs in Excavation 2 and a grab groundwater sample was collected on October 6, 2022.
Groundwater was encountered at approximately 14 ft-bgs in Excavation 3 and a grab groundwater sample was collected on October 18, 2022.

Groundwater samples were submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260B. All analytical results were reported below laboratory detection limits indicating that groundwater is not impacted at the Site.

In addition, on December 13, 2021, following four consecutive compliant quarters of groundwater monitoring data from the four monitoring wells installed at the Site, the COGCC approved closure of quarterly groundwater monitoring requirements associated with Remediation Project #8677 in Supplemental Form 27 Document #402876579.

One monitoring well was removed during September 2022 excavation activities. The remaining three monitoring wells were plugged and abandoned, in accordance with State standards, during background soil boring activities in September 2023.

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.

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?

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?

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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 facility closure activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location was reclaimed in accordance with the ECMC 1000 series.

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. 10/20/2023

Proposed date of completion of Reclamation. 10/20/2025

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. 07/06/2022

Actual Spill or Release date, or date of discovery. 09/21/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/05/2022

Proposed site investigation commencement. 09/20/2022

Proposed completion of site investigation. 09/28/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/04/2022

Proposed date of completion of Remediation. 10/21/2022

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:

Proposed Completion of Site Investigation date was changed based on ECMC requirement to conduct a background evaluation for arsenic and barium

OPERATOR COMMENT

This Form 27 (Document Number 403283666) was initially submitted as a Closure Request on January 10, 2023 along with a facility closure and excavation report. The Form was Returned to Draft on March 29, 2023, with a General Comment: "Operator shall conduct additional background evaluation for arsenic, barium, and selenium". A reduced analyte request to analyze background samples for arsenic and barium was approved on Form 27 Document Number 403472534 on July 21, 2023.

On September 28, 2023, 30 additional background samples were collected from 10 soil boring locations offsite and away from potential impacts. Samples were collected from the 5-7 ft-bgs, 10-12 ft-bgs, and 13-15 ft-bgs intervals, representative of confirmation soil samples collected from the excavations conducted during the Fall of 2022.

To evaluate the likelihood of product produced at the former Mershon Pad facility contributing to elevated metals concentrations at the Site, produced water samples (PW01 and 25-241HC) were collected from separators at the Kodak South FD pad approximately 0.3 miles west of the Site, and submitted for analysis of total recoverable metals: arsenic, barium, cadmium, copper, lead, nickel, selenium silver and zinc by EPA Method 200.8.

Based on the analytical data presented above, PDC respectfully requests a No Further Action determination for remediation project number 24760. Background soil boring locations, background soil sample analytical results, and produced water analytical results are provided in the attached Facility Closure Report.

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: 04/30/2024

Email: ENspillremediationcontractor@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: RICK ALLISON

Date: 06/18/2024

Remediation Project Number: 24760

COA Type

Description

	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>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.</p>
1 COA	

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

403563331	FORM 27-SUPPLEMENTAL-SUBMITTED
403774256	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)