

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403863906

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10537 Initial Form 27 Document #: 401398541

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>SPILL OR RELEASE</u>	Facility ID: <u>451446</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>J&L Farms 14, 24-29</u>	Latitude: <u>40.451510</u>	Longitude: <u>-104.467790</u>	
	** correct Lat/Long if needed: Latitude: <u>40.451510</u>	Longitude: <u>-104.467790</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>29</u>	Twps: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

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

Residential buildings are located approximately 975 feet northwest of the tank battery location. Ranch land and livestock are located approximately 1520 feet east of the tank battery location.

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	GROUNDWATER	Refer to Table 1 and Figure 1	Completion of the Site Investigation Plan
Yes	SOILS	Refer to ECMC Doc No. 401398541	Completion of excavation activities.

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 July 19, 2017, historic impacts were discovered beneath the produced water vessel during plug and abandonment activities at the J&L Farms 14, 24-29 production facility. Approximately 860 cubic yards of impacted material were removed and transported to the North Weld Landfill in Ault, Colorado for disposal under PDC waste manifests. A Supplemental Form 19 was submitted to the ECMC on July 28, 2017, under document #401357340. The ECMC issued Spill Point ID# 451446 to the project.

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 July 17 and August 24, 2017, eight (8) soil samples were collected from the sidewalls of the final extent of the excavation at approximately 16 feet below ground surface (bgs). Soil samples were submitted to Summit Scientific Laboratories (Summit) in Golden, Colorado for analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260, and TPH - diesel range organics (DRO) by USEPA Method 8015. Analytical results indicated all soil samples collected from the final extent of the excavation were in compliance with ECMC Table 910-1 standards. Based on soil analytical results, the lateral extent of petroleum hydrocarbon impacts within the unsaturated interval were successfully defined and removed during excavation activities. No further soil sampling is required.

Proposed Groundwater Sampling

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

Two (2) groundwater samples (GW01 and GW02) were collected from the excavation area on August 31 and September 5, 2017. Samples were submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results indicated benzene concentrations were in exceedance of ECMC Table 910-1 standards in both groundwater 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):

Six (6) temporary monitoring wells will be installed via direct push drilling methods to delineate the extent of dissolved-phase hydrocarbon impacts.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 10

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 2235

NA / ND

-- Highest concentration of TPH (mg/kg) 2310

NA Highest concentration of SAR _____

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 15

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 18

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 2

-- Highest concentration of Benzene (µg/l) 60

-- Highest concentration of Toluene (µg/l) 3.4

-- Highest concentration of Ethylbenzene (µg/l) 2.2

-- Highest concentration of Xylene (µg/l) 170

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) 840

Volume of liquid waste (barrels) 220

Is further site investigation required?

On December 9, 2021, three (3) monitoring wells (BH07R2 and BH14 – BH15) were installed to replace dry well BH07R and establish point of compliance (POC) down-gradient of monitoring well BH13. Lithologic descriptions and volatile organic compound (VOC) concentrations measured using a photoionization detector (PID) were recorded for each monitoring well.

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.

On July 19, 2017, historic impacts were discovered beneath the produced water vessel during the plug and abandonment activities at the J&L Farms 14, 24-29 production facility. The lateral and vertical extent of the excavation was determined in the field using a photoionization detector (PID) to measure volatile organic compound (VOC) concentrations in soil. Approximately 840 cubic yards of impacted material were removed and transported to the North Weld County Landfill in Ault, Colorado for disposal under PDC waste manifests. Eight (8) soil samples (SS03 - SS10) were collected from the sidewalls of the final extent of excavation at approximately 16 feet below ground surface (bgs). Samples were submitted to Summit Scientific Laboratories in Golden, Colorado for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by USEPA Method 8260B, and TPH - diesel range organics (DRO) by USEPA Method 8015. Analytical results indicated constituent concentrations were below ECOMC Table 910-1 soil standards in the samples collected from the final extent of the excavation.

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.

Monitored natural attenuation (MNA) was selected as the remediation strategy for this site during the fourth quarter 2017 and will continue as the selected remediation strategy through the third quarter 2024.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 840

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

Yes _____ 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 monitoring will continue on a quarterly basis at the fifteen site monitoring wells (BH01R, BH02, BH03, BH04R, BH05, BH06R, BH07R2 and BH08-BH15) until closure criteria are achieved. Groundwater samples will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260B in accordance with Table 915-1. Per the approved Supplemental Form 27 (Document No. 402843224), inorganic parameters were removed from the sampling and analysis plan following the third quarter 2021 groundwater monitoring event.

Monitoring well BH08 was dry upon arrival and consequently, no sample was collected from this monitoring well during the second quarter 2024. Second quarter 2024 analytical results indicated that organic compound concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring wells BH05 and BH06R. Organic compound concentrations were in compliance with the applicable ECMC Table 915 -1 regulatory standards in the remaining 12 sampled monitoring well locations.

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.

- Investigation and delineation has been completed in soil and groundwater.
- Source mass removal has been completed, monitoring wells were installed, and groundwater will continue to be monitored for natural attenuation.
- Facility and infrastructure were decommissioned and the location will be reclaimed in accordance with the ECOM 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: \$ 10000

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 840

E&P waste (solid) description E&P contaminated soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: North Weld Waste Management Facility

Volume of E&P Waste (liquid) in barrels 220

E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Licensed 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 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.

The excavation was backfilled, compacted, and re-contoured to match pre-existing conditions. The produced water vessel and associated production infrastructure were decommissioned following excavation activities and the location will be reclaimed in accordance with the ECMC 1000 Series.

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. 07/19/2017

Proposed date of completion of Reclamation. 01/11/2027

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. 07/19/2017

Actual Spill or Release date, or date of discovery. 07/19/2017

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/19/2017

Proposed site investigation commencement. 07/20/2017

Proposed completion of site investigation. 07/27/2017

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/20/2017

Proposed date of completion of Remediation. 01/11/2027

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 Supplemental Form 27 was submitted to summarize quarterly groundwater monitoring activities and analytical results collected during the second quarter 2024 at the former J&L Farms 14, 24-29 location.

Second quarter 2024 analytical results indicated that organic compound concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring wells BH05 and BH06R. Organic compound concentrations were in compliance with the applicable ECMC Table 915-1 regulatory standards in the remaining 12 sampled monitoring well locations.

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: _____

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: _____

Date: _____

Remediation Project Number: 10537

COA Type

Description

<u>COA Type</u>	<u>Description</u>
0 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

403865059	MONITORING REPORT
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)