

State of Colorado
Energy & Carbon Management Commission

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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 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 & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37023 Initial Form 27 Document #: 403883118

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: Investigation Progress Report

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 486729	API #:	County Name: WELD
Facility Name: Four Parmlee (H-6-9) 3/2024	Latitude: 40.252892	Longitude: -104.266391	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NESE	Sec: 1	Twp: 3N	Range: 6W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use Range

Is domestic water well within 1/4 mile? No 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

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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	Undetermined	Laboratory 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.

In March 2024, a potential oil and gas release was discovered during a routine flyover of a gas gathering line at the project location. The gathering line was immediately shut-in, and the gathering line has remained offline since discovery. Investigation was initiated on 5/13/24, and a leak on the east side of gathering line at the 3 o'clock position was discovered. Between 5/13/24 & 7/3/24, DCP Operating Company, LP / Phillips 66 (DCP/P66) performed delineation & investigation activities using test pitting & excavation methods. Soils were field screened with a PID instrument which indicated potentially impacted soils surrounding the leak location. Based on physical soil observations, PID readings, and initial laboratory results petroleum hydrocarbon impacts appear to extend to between 50 and 54 feet bgs near the source location and approximately 150' North and South and 100' East & West of the source location. Groundwater was encountered during excavation and test pitting activities at a depth between approximately 40 and 50 feet below ground surface (bgs). During the investigation and remediation activities, approximately 6510 cubic yards of impacted soil was removed and transported to the Waste Management Buffalo Ridge Landfill for disposal. Due to the size of impacted soil distribution and difficult lithology encountered between approximately 20 and 55 feet bgs, excavation activities were discontinued, and the excavation was backfilled between 7/30 and 8/9 2024 to facilitate further investigation work using hollow stem augur (HSA) drilling with continuous core sampling methods. In accordance with the conditionally approved Form 27-I #403883118, remediation number #37023 was assigned to this project and DCP/P66 advanced seven (7) soil borings which were converted to groundwater monitoring wells in October 2024. The soil sample analytical data and soil boring/monitoring well construction logs are provided herein.

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 May 13, 2024, and July 3, 2024, a total of 25 grab soil samples were collected from the site and the data was presented in approved Form 27-I (#403883118). In October 2024, drilling, soil sampling, and groundwater monitoring well installation was completed at the locations illustrated on Figure 2. Soil sampling was conducted by hollow stem augur drilling methods with continuous core sampling at 7 locations at the site. Soil sample analytical results for the boreholes are summarized in Tables 1 through 3. The GPS location data for each boring and the laboratory analytical reports are provided as separate attachments. Soil samples were collected from the depth with the highest PID detection, and/or just above the saturated interval, and the total depth of the borehole. Soil samples were submitted to Summit Scientific for laboratory analysis of full Table 915 analytes. Based on the soil analytical data, DCP/P66 does not anticipate additional soil sampling at this time.

Proposed Groundwater Sampling

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

In October 2024, DCP/P66 installed seven (7) groundwater monitoring wells at the site for groundwater delineation which are illustrated on Figure 2. Monitoring well installation was advanced to approximately 55 feet bgs using hollow stem augur drilling with continuous core sampling methods to evaluate soil conditions at the Site. Groundwater monitoring activities and monitoring well surveying for top of casing elevations was completed in late October 2024. Groundwater samples were submitted for laboratory analysis and the results are still pending and will be provided in a subsequent Form 27-S report. Groundwater monitoring will continue on a quarterly basis until four consecutive quarters of results below the standards and no further action is approved by 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):

Following an evaluation of the data from the October 2024 soil and groundwater investigation, additional action may be warranted, and details will be provided to the ECMC in a Form 27-S work plan.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 14

Number of soil samples exceeding 915-1 14

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

Approximate areal extent (square feet) 60000

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 0.701

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 55

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 45

Number of groundwater monitoring wells installed 7

Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 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?

Three (3) background samples were collected during previous investigations and background analytical data were returned with elevated levels of arsenic above the Table 915-1 standards. Based on these data, arsenic concentrations above Table 915-1 standards is believed to be naturally occurring at the site.

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

Volume of solid waste (cubic yards) 6510

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Following the monitoring well installation, quarterly groundwater sampling was completed in late October 2024 and is anticipated to continue on regular basis until a no further action at the site is approved by ECOM. Any future site investigations will be proposed to the ECOM in Form 27-S documents.

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.

The section of gathering line where the hole was located has been removed. Approximately 6510 cubic yards (CY), or 9600 tons, of impacted material has been excavated and transported to the Buffalo Ridge Landfill for offsite disposal. Additional remediation activities will be evaluated based on the drilling investigation activities and future groundwater monitoring events.

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.

Approximately 6510 cubic yards (CY) of impacted material were excavated and transported to the Buffalo Ridge Landfill. Based on analytical data collected throughout the initial excavation and the additional delineation activities that took place in October 2024, future remedial efforts will be addressed in a subsequent Form 27.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 6510

_____ 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

_____ 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 monitoring activities were conducted on 10/24/2024 and 10/25/2024 and included Site-wide groundwater gauging and sampling for Table 915-1 parameters. Groundwater levels are measured to evaluate hydraulic characteristics and provide information regarding seasonal fluctuations at the Site. Wells were gauged and sampled at all seven (7) monitoring well locations using standard groundwater sampling methods and submitted to Pace Analytical Laboratory (Pace) for analysis of Table 915-1 organic parameters by EPA Method 8260D. Laboratory data is pending at the time of this report submittal and will be provided in a subsequent Form 27-S work plan.

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 Progress update

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/P66 maintains appropriate comprehensive general liability insurance to satisfy the requirements of Rule 705.B, with at least \$5MM in coverage and including coverage for sudden and accidental release events. The cost provided below for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. DCP/P66 makes no representation or guarantees as the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 300000

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:

NA

Volume of E&P Waste (solid) in cubic yards 6510

E&P waste (solid) description soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management Buffalo Ridge

Volume of E&P Waste (liquid) in barrels 0

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? No

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 and test pit investigation area has been backfilled. Following completion of additional investigation and potential remedial activities, site surfaces will be regraded to match existing conditions with landowner, and ECMC approval. Final reclamation will be conducted following completion of the soil investigation and groundwater monitoring once a no further action determination and eventual site closure is approved by the ECMC.

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. 05/14/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/14/2024

Proposed site investigation commencement. _____

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/01/2025

Proposed date of completion of Remediation. _____

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 Supplemental is being submitted to update the ECMC on the additional investigation and remediation efforts at the Site. The arsenic concentration at MW07 (28') of 76.4 mg/kg appeared to be anomalous and the sample was re-analyzed. The second result had a concentration of 45.4 mg/kg and both results are presented in Table 3. Pending additional investigation activities as described herein, DCP/P66 will present proposed remediation activities in a Form 27-Supplemental report.

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: 37023

COA Type**Description**

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**

403984806	ANALYTICAL RESULTS
403984807	ANALYTICAL RESULTS
403984809	ANALYTICAL RESULTS
403984810	ANALYTICAL RESULTS
403984812	ANALYTICAL RESULTS
403986341	OTHER

Total Attach: 6 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)