

State of Colorado  
Energy & Carbon Management Commission

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Receive Date:  
09/13/2024

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36382 Initial Form 27 Document #: 403843123

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>LOCATION</u>	Facility ID: <u>472456</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Village 31, 32, 41, 42-</u>	Latitude: <u>40.399472</u>	Longitude: <u>-104.889207</u>	
	** correct Lat/Long if needed: Latitude: <u>40.399844</u>	Longitude: <u>-104.889369</u>	
QtrQtr: <u>NESE</u>	Sec: <u>16</u>	Twp: <u>5N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland  
 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

NA

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X 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

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Rows include UNDETERMINED GROUNDWATER and SOILS.

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

A site investigation was conducted pursuant to ECMC Rule 911 at the Village 31, 32, 41, 42 Facility and Tank Battery location.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

X Will soil samples be collected as part of this investigation? ( Number, type (grab/composite), analyses, and locations of samples ):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), at the risers for the flowline (s) and dumpline(s) of any separator(s).

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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 ):

Visual inspection at the tank battery area occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 24

Number of soil samples exceeding 915-1 24

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

Approximate areal extent (square feet) 1600

### NA / ND

-- Highest concentration of TPH (mg/kg) 787

-- Highest concentration of SAR 2.54

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

### 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 \_\_\_\_\_

\_\_\_\_\_ 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?

Four background soil samples were collected near the tank battery and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Four additional background samples were collected near the tank battery and analyzed for metals in soil per ECMC Table 915-1 and pH. Background soil samples were collected from depths ranging between 3 to 6 feet below ground surface (ft bgs). The maximum background concentration for pH was observed to be 9.08. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 7.24 mg/kg, 315 mg/kg, and 0.376 mg/kg, respectively. All pH, arsenic, barium, and selenium concentrations observed during decommissioning were below background levels. As such, pH, barium, and selenium should not be considered contaminants of concern.

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?

Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, background soil samples will be collected to determine if EC and SAR are attributed to native soil conditions at the site. Proposed background soil sample locations are shown on the attached proposed soil boring location map.

## 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.

An approximately 70 cubic yard portion of source materials was characterized under sample WC01 and transported off-site for disposal. No other source material has been generated at this time.

The 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, 1-M, and 2-M exceedances observed at sample locations CS01@0-6" and CS03@0-6" will be removed through a remedial excavation. Additionally, a confirmation sample beneath the stockpile characterized under sample WC01 to identify potential residual impacts from the removed stockpiled material.

### 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.

Based on the ECMC Table 915-1 exceedances identified during decommissioning, PDC proposes to limit future soil sampling BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, TPH, benzo(a)anthracene, fluoranthene, fluorene, 1-M, 2-M, and cadmium. If soil that is more heavily impacted with hydrocarbon compounds (based on PID readings, visual and/or olfactory indicators) is discovered during the remedial excavation, a soil sample will be collected from that location and analyzed for full ECMC Table 915-1 contaminants of concern. If additional analytes are discovered from this new waste characterization sample in exceedance of ECMC Table 915-1 standards beyond those proposed in the above amended sampling plan request, those compounds will be added to the sampling plan. The results of the remedial excavation will be submitted on a subsequent Form 27.

**Soil Remediation Summary**

In Situ

Ex Situ

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

- Yes \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 70
- \_\_\_\_\_ 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.

# 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 Decommissioning Sample Summary, Supplemental Source Mass Removal and Site Investigation Proposal

## 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.

- Further background soil investigation is required
- Supplemental source mass removal is required

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: \$ 75000

## 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 Source Material

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management - North Weld

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? \_\_\_\_\_

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.

Reclamation will be in accordance with ECMC 1000 Series Rules.

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. 06/20/2024

Proposed date of completion of Reclamation. 08/27/2026

## 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. 02/05/2024

Actual Spill or Release date, or date of discovery. 08/15/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/20/2024

Proposed site investigation commencement. 09/13/2024

Proposed completion of site investigation. 03/13/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/13/2025

Proposed date of completion of Remediation. 03/13/2026

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:

The implementation schedule has been changed due to the decommissioning of the Village 31, 32, 41, 42 tank battery, and necessity for remedial excavation activities adjacent to the tank battery. The proposed remedial excavation will be completed following the approval of this form, landowner negotiations, and crew availability.

## OPERATOR COMMENT

This Form 27 is being submitted to include the decommissioning results and historical reportable release at the former Village 31, 32, 41, 42-Tank Battery location. A proposal to excavate the 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, 1-M, and 2-M exceedances identified during decommissioning sample locations CS01@0-6" and CS03@0-6", and to collect a confirmation sample beneath the stockpile characterized under sample WC01 to identify potential residual impacts from the removed stockpiled material is presented in the Remedial Action Plan section of this Form 27.

Four background soil samples (BKG01) were collected from adjacent to the tank battery location.

Four additional background samples were collected near the tank battery and analyzed for metals in soil per ECMC Table 915-1 and pH. The lithology between the site and background locations were observed to be lean clay and clayey sands. The maximum background value of pH was 9.08 mg/kg. All site pH values were below this level. Since the maximum background value for pH was observed to be greater than the site levels, PDC requests pH to not be considered a contaminant of concern.

The maximum background concentration of arsenic was 5.79 mg/kg, and 1.25 the maximum background concentration was calculated to be 7.24 mg/kg. All site arsenic concentrations were below this concentration. Since the maximum background concentration for arsenic was observed to be greater than the site concentrations, PDC requests arsenic to not be considered a contaminant of concern.

The maximum background concentration of barium was 252 mg/kg, and 1.25 the maximum background concentration was calculated to be 315 mg/kg. All site barium concentrations were below this concentration. Furthermore, the mean background soil sample concentration x1.25 was calculated to be 258 mg/kg. Since the maximum and mean background concentration for barium was observed to be greater than the site concentrations, PDC requests barium to not be considered a contaminant of concern.

The maximum background concentration of selenium was 0.301 mg/kg, and 1.25 the maximum background concentration was calculated to be 0.376 mg/kg. All site selenium concentrations were below this concentration. Furthermore, the mean background soil sample concentration x1.25 was calculated to be 0.353 mg/kg. Since the maximum and mean background concentration for selenium was observed to be greater than the site concentrations, PDC requests selenium to not be considered a contaminant of concern.

Based on the contaminants of concern identified during decommissioning, Noble proposes to limit future soil sampling to BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, TPH, benzo(a)anthracene, fluoranthene, fluorene, 1-M, 2-M, and cadmium. Concurrent with excavation activities, additional background samples will be collected to determine if cadmium observed at this location is indicative of native material conditions.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the remedial excavation will be submitted on a subsequent Form 27.

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: 09/13/2024

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: 11/08/2024

Remediation Project Number: 36382

### COA Type

### Description

	Based on the exceedances identified during decommissioning, ECMC agrees to the Operator's request to limit future soil sampling to BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, TPH, benzo(a)anthracene, fluoranthene, fluorene, 1-M, 2-M, and cadmium.  Other exceedances mentioned will be evaluated upon receipt of background soil sample location maps.
	As no background maps were provided in this Form 27-S, ECMC cannot make a determination on whether pH, As, Ba, or Se should be considered contaminants of concern at this time.
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

403891279	FORM 27-SUPPLEMENTAL-SUBMITTED
403902318	ANALYTICAL RESULTS

403902320	ANALYTICAL RESULTS
403902322	ANALYTICAL RESULTS
403902324	ANALYTICAL RESULTS
403902325	ANALYTICAL RESULTS
403902326	ANALYTICAL RESULTS
403902327	ANALYTICAL RESULTS
403902328	ANALYTICAL RESULTS
403920033	ANALYTICAL RESULTS
403920035	ANALYTICAL RESULTS
403920610	OTHER

Total Attach: 12 Files

**General Comments**

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

Total: 0 comment(s)