

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Kilian Collins

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: (970) 378-6373
City: HOUSTON	State: TX	Zip: 77042
Contact Person: Chandler Cole	Email: Chandler.E.Cole@p66.com	Mobile: (970) 939-0329

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30482 Initial Form 27 Document #: 403466904

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: 3Q24 Groundwater Monitoring report

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 484282	API #: _____	County Name: WELD
Facility Name: Coan AT-1-1	Latitude: 40.010331	Longitude: -104.477020	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 31	Twp: 1N	Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use rangeland
 Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes
 Is groundwater less than 20 feet below ground surface? No

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	undetermined	monitoring well and laboratory analysis
Yes	SOILS	972 sq ft	Field screening and 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.

On 4/14/23, a condensate release was discovered on a 10-inch DCP/P66 line approximately 0.45 miles southwest of County Road (CR) 63 and CR 4. The release was identified by DCP/P66 Operations and upon discovery, DCP/P66 immediately shut in the line to prevent further release. The landowner was notified of the release immediately. Excavation activities began on 4/18/23 and excavation efforts between 4/18/23 and 5/4/23 removed approximately 1200 cubic yards of contaminated soil for disposal at Buffalo Ridge Landfill. All visual and soil impacts are presented in the approved initial Form 19I (#403374534) and Form 19S (#403380838) and ECMC issued spill/release point ID #484282. Impacted material has been removed in accordance with ECMC approval to adhere to Residential Soil Standard and the extents of the excavation were determined by field screening soils using a PID and laboratory analysis. Sidewall and base samples were submitted for laboratory analysis of Table 915 VOCs, TPH, and select PAHs. Following the backfilling of the excavation, DCP/P66 notified the landowner and in an abundance of caution, informed the landowner a temporary monitoring well (MW01) would be installed after source removal activities to evaluate the depth of water and if any impacts were present. DCP/P66 collected a groundwater sample, and had it analyzed for Table 915-1 organics, and the results indicated there were minor impacts. DCP/P66 subsequently installed four additional monitoring wells in the area surrounding the former excavation, for a total of five wells, in accordance with the approved Form 27-1 (#403466904). The site was assigned REM #30482. Nine soil samples were collected from wells MW02-MW05 during drilling. Quarterly groundwater monitoring has been ongoing since the third quarter 2023 (3Q23). Details of the groundwater monitoring activities completed in 3Q24 are provided herein. Future activities will be provided to the ECMC in subsequent Form 27 submittals.

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):

Previous soil sampling was presented in the approved F19-S (#403466854). Based on the source soil results, a reduced analyte list was approved. On 6/21/23, a borehole was advanced to 43.5 feet below ground surface (ft bgs) to determine the depth of groundwater. Soil samples were not collected and based on the results of the groundwater sample, additional borings/wells were warranted to horizontally delineate the groundwater impacts. On July 26-27, 2023, four additional borings were each advanced to a depth of 42 ft bgs in the area surrounding the former excavation. The soil borings were logged to evaluate geological conditions and identify potential impacts to soil at these locations. Boring logs and soil sample analytical results were presented in the approved F27-S (#403533389).

Proposed Groundwater Sampling

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

A total of five groundwater monitoring wells are currently installed at this site. During the 3Q24, five wells were gauged and sampled on 8/21/2024. The groundwater analytical results are presented in Table 2 and Figure 4, and groundwater sample locations are presented in Figure 2. The groundwater laboratory report is included as Appendix A. Groundwater monitoring will continue on a quarterly basis until analytical results are below ECMC standards for four consecutive quarterly monitoring events, at which time a no further action (NFA) determination for the site will be requested from the 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):

Laboratory data indicated that all soil in exceedance of ECMC Protection of Groundwater Standards has been removed. Groundwater was not initially observed in the excavation, however, DCP/P66 notified the landowner a temporary monitoring well would be installed, and a sample would be collected. DCP/P66 installed a temporary well (MW01) approximately 5 feet below the excavation depth on June 19, 2023, and groundwater was encountered. The well was sampled, and minor impacts were observed. DCP/P66 subsequently installed four additional wells (MW02-MW05) in the area surrounding the former excavation. The five wells were gauged and sampled on August 21, 2024 and the analytical results are presented in Table 2 and Figure 4.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 972

NA / ND

NA Highest concentration of TPH (mg/kg) _____
NA Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 42

Groundwater

Number of groundwater samples collected 5
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 39
Number of groundwater monitoring wells installed 5
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?

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

Volume of solid waste (cubic yards) 1200 Volume of liquid waste (barrels) 0

Is further site investigation required?

DCP/P66 will complete quarterly groundwater monitoring activities at the five monitoring well locations. Based on current observations, DCP/P66 is evaluating the site characteristics with respect to groundwater concentrations and does not propose further site investigation activities at this time.

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.

Approximately 1700 tons (~1200 cubic yards [CY]) of impacted material were transported to Waste Management Buffalo Ridge Landfill for offsite disposal during April and May 2023.

REMEDIATION 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 1700 tons (1200 cy) of impacted material were excavated and transported to the Waste Management Buffalo Ridge Landfill. DCP/P66 has installed five monitoring wells on site. Quarterly groundwater monitoring at the 5 wells is ongoing and will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below ECMC Table 915-1 standards, at which time an NFA determination for the Site will be requested from the ECMC.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 1200

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

No _____ 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.

Initial groundwater results at the source area indicated a minor impact to groundwater and a monitoring well network consisting of 5 wells, illustrated in Figure 2, has been installed by DCP/P66 in accordance with ECMC approval in the previous Initial Form 27 work plan (#403466904). Groundwater monitoring is ongoing at the Site and will continue until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below ECMC Table 915 standards, at which time a no further action (NFA) determination for the Site will be requested from the ECMC. Third quarter 2024 groundwater monitoring activities were conducted on 8/21/2024 and included Site-wide groundwater gauging and sampling for Table 915-1 organic parameters. Groundwater levels are measured to evaluate hydraulic characteristics and provide information regarding seasonal fluctuations at the Site. Wells were gauged and sampled on 8/21/2024 at all five well locations using standard groundwater sampling methods and submitted to Pace Analytical Laboratory for Table 915-1 organics parameters by EPA Method 8260D. In the third quarter, concentrations of Table 915-1 organic constituents were below the ECMC standards and/or the laboratory detection limits at 5 of the 5 sampled locations, the third consecutive quarter with no laboratory detections. Groundwater elevations are presented on Table 1 and Figure 3. The laboratory results are presented on Table 2 and Figure 4, historical analytical results are attached as Table 3, and laboratory reports are included as Appendix A.

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.

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 to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 50000

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:

1200 CY of impacted soil

Volume of E&P Waste (solid) in cubic yards 1200

E&P waste (solid) description Approximately 1200 cy of impacted material was transported to the Waste Management Buffalo Ridge

ECMC Disposal Facility ID #, if applicable: 0

Non-ECMC Disposal Facility:

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?

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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Following completion of the ongoing remedial activities, site surfaces will be regraded to match existing conditions with landowner and Weld County approval. Final reclamation will be conducted following completion of the soil investigation, groundwater monitoring, and well decommissioning once an NFA 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. 12/31/2024

Proposed date of completion of Reclamation. 03/31/2025

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. 04/14/2023

Actual Spill or Release date, or date of discovery. 04/14/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/18/2023

Proposed site investigation commencement. 06/19/2023

Proposed completion of site investigation. 12/31/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/01/2023

Proposed date of completion of Remediation. 12/31/2024

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

DCP/P66 plans to continue quarterly groundwater monitoring until four consecutive quarters of concentrations below Table 915-1 standards are observed, at which time a no further action determination and closure request will be submitted.

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

Signed: Chandler Cole

Title: Compliance Coordinator

Submit Date: 09/24/2024

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: 30482

COA Type**Description**

0 COA	
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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**

403927586	FORM 27-SUPPLEMENTAL-SUBMITTED
403927616	MONITORING REPORT

Total Attach: 2 Files

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

Environmental	ECMC has denied this Form 27 for data validation. Operator will provide laboratory analytical report(s) as a stand-alone attachment(s) on the replacement Supplemental Form 27. The Laboratory Report PDF(s) must be secured by the issuing laboratory; If there is a difference between the creation date and secured date of the PDF, Operator shall provide an explanation in the case narrative of the associated report. ECMC will not review combined PDFs with lab reports.	02/06/2025
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Total: 1 comment(s)