

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 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: 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		Mobile: (970) 939-0329
Contact Person: Chandler Cole	Email: Chandler.e.cole@p66.com	

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: 1Q25 Report and Site Closure Request

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
No	GROUNDWATER	NA	4 quarters of Lab 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 gathering line approximately 0.45 miles southwest of County Road (CR) 63 and CR 4. The release was identified by DCP Operating Co, LP / Phillips 66 (DCP/P66) and upon discovery, the gathering line was immediately shut in to prevent further release. Excavation activities performed between 4/18/23 and 5/4/23, removed approximately 1,200 cubic yards (CY) of impacted soil for subsequent disposal.

Initial response activities were presented in the approved Form 19-Initial (#403374534) and Form 19-Supplemental (#403380838 and #403466854) reports and ECMC issued spill/release point ID #484282. Impacted soil above ECMC Table 915-1 Protection of Groundwater Soil Screening Level concentrations was mitigated through excavation and disposal remediation methods as verified by laboratory analytical results presented in previous Form 19 and Form 27 reports.

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 was performed beginning in the third quarter 2023 (3Q23), and the fourth quarter 2024 (4Q24) monitoring event performed on November 11, 2024, and summarized in Form 27-S report #404019048, marked the fourth consecutive quarter of data below ECMC Table 915-1 standards.

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, and based on the source area soil sample results, a reduced analyte list was approved. Subsequent laboratory data indicated that all soil in exceedance of ECMC Protection of Groundwater Standards was removed. 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 groundwater impacts. Between July 26 and 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). Additional soil sample investigation is not being proposed.

Proposed Groundwater Sampling

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

As submitted in Form 27-S report #404019048, the fourth quarter 2024 groundwater monitoring event performed on November 11, 2024, marked the fourth consecutive quarter of groundwater results below the ECMC Table 915-1 standards. In accordance with Rules 913.h.(1) and (3), DCP/P66 requested closure of the site in the 4Q24 report mentioned previously. This Form 27-S report is being submitted to comply with Rule 913.e. and the quarterly reporting requirement because the previous two (2) Form 27-S reports (#404084386 [3Q24] and #404019048 [4Q24]) are still in process at the time of this Form 27-S submittal deadline. DCP/P66 does not propose or anticipate additional groundwater monitoring and is awaiting a response from the ECMC for the site closure request.

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):

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 0
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

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
 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?

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 1,700 tons (1,200 CY) of impacted material were transported to the Waste Management Buffalo Ridge Landfill for 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 1,700 tons (1,200 CY) of impacted material were excavated and transported to the Waste Management Buffalo Ridge Landfill for disposal. DCP/P66 installed five monitoring wells on site. Quarterly groundwater monitoring was performed beginning in the 3Q23, and the 4Q24 monitoring event performed on November 22, 2024, and summarized in Form 27-S report #404019048 marked the fourth consecutive quarter of data below ECMC Table 915-1 standards. Therefore, remediation activities were successful in mitigating impacts to soil and groundwater and DCP/P66 is requesting approval for site closure.

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 laboratory analytical results at the source area indicated a minor impact to groundwater and a monitoring well network consisting of 5 wells was installed by DCP/P66 in accordance with ECMC approval in the Initial Form 27 work plan #403466904. Quarterly groundwater monitoring was performed beginning in the 3Q23, and the 4Q24 monitoring event performed on November 11, 2024, and summarized in Form 27-S report #404019048 marked the fourth consecutive quarter of data below ECMC Table 915-1 standards. In accordance with Rules 913.h.(1) and (3), DCP/P66 requested closure of the site in the 4Q24 report mentioned previously. This Form 27-S report is being submitted to comply with Rule 913.e. and the quarterly reporting requirement because the previous two Form 27-S reports (#404084386 [3Q24] and #404019048 [4Q24]) are still in process at the time of this Form 27-S submittal deadline. DCP/P66 does not propose or anticipate additional groundwater monitoring and is awaiting a response from the ECMC for the site closure request.

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: \$ 20000 _____

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:

Impacted soil was disposed of at the Waste Management Buffalo Ridge landfill in Keenesburg, CO.

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

E&P waste (solid) description _____ E&P waste impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____ Waste Management Buffalo Ridge Landfill

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? Yes _____

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

Following approval of the site closure request, the groundwater monitoring wells will be abandoned per the Colorado Office of the State Engineer specifications and the monitoring well footprints will be regraded to match existing conditions and re-seeded with Landowner consultation and approval. The area of the former excavation and surrounding land has been reclaimed by the landowner.

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. 05/31/2025

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

Quarterly groundwater monitoring was performed beginning in the 3Q23, and the 4Q24 monitoring event performed on November 11, 2024, and summarized in Form 27-S report #404019048, marked the fourth consecutive quarter of data below ECMC Table 915-1 standards. In accordance with Rules 913.h.(1) and (3), DCP/P66 requested closure of the site in the 4Q24 report mentioned previously. This Form 27-S report is being submitted to comply with Rule 913.e. and the quarterly reporting requirement because the previous two (2) Form 27-S reports (#404084386 [3Q24] and #404019048 [4Q24]) are still in process at the time of this Form 27-S submittal deadline. Additionally, Tasman, Inc. on behalf of DCP/P66 contacted the ECMC via email on January 31, 2024, and via phone call and voicemail on February 18, 2025, regarding the site closure request and has not received a response. DCP/P66 does not propose or anticipate additional groundwater monitoring and is awaiting a response from the ECMC for the site closure request.

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

Signed: Chandler Cole

Title: Environmental Specialist

Submit Date: 04/03/2025

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

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

404139730	FORM 27 DENIED
404160883	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

Environmental	<p>Previous forms were denied. Operator must submit all attachments that were denied in order to request NFA.</p> <p>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.</p> <p>ECMC has coordinated with this lab and an acceptable signature process has been developed.</p>	04/10/2025
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Total: 1 comment(s)