

**Form 4 Sundry Notice Attachment
Concerning Remediation of the Eldridge 4-23 Location**

Pursuant to discussions with the Energy and Carbon Management Commission (“ECMC” or “Commission”) Staff, PDC Energy Inc. (Operator No. 69175) (“PDC”) seeks to extend the deadline for final reclamation of the Eldridge 4-23 Location (Facility ID 451116) (“Location”) until December 31st, 2024. As explained below, this extension is necessary because of a pending dispute between PDC and the surface owner, Keirnes Land Company, LLC (“Surface Owner”), which is preventing PDC from accessing the property for reclamation purposes.

In 2017, PDC’s predecessor, SRC Energy Inc. reported and began remediating soil and groundwater contamination at the Location. Form 19, Initial Spill/Release Report (June 16, 2017) (Document No. 401310873); Form 27, Initial Site Investigation and Remediation Workplan (Nov. 9, 2017) (Document No. 401452818). The ECMC designated this work as Remediation Project No. 10672. Following the January 14, 2020 merger between PDC and SRC, PDC continued this Remediation Project.

In January 2023, PDC requested and in March 2023 ECMC approved final closure of the Remediation Project. Form 27, Supplemental Site Investigation and Remediation Workplan (filed Jan. 12, 2023 and approved March 29, 2023) (Document No. 403283778). The Form 27 notes that except for the remediation areas, the “Location has been reclaimed and seeded per COGCC 1000 series rules.” The ECMC’s project closure imposes a condition of approval (“COA”) that the “surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.”

Since June 2023, PDC and the Surface Owner have been engaged in a dispute involving the Surface Owner’s demand for damages and costs associated with the prior Location impacts. Although no lawsuit has been filed to date, the parties continue to disagree regarding a fair and appropriate resolution of this matter and settlement does not appear imminent. The Surface Owner has prohibited PDC from accessing the Location to remove existing equipment or perform additional work until the dispute is resolved. This access prohibition prevents PDC from undertaking further reclamation work at the Location as contemplated by the COA and the 1000 Series Rules.

Under these circumstances, PDC respectfully requests that the deadline for PDC to undertake additional reclamation at the Location under the COA and the 1000 Series Rules be extended to December 31st, 2024. This will provide additional time for PDC and the Surface Owner to attempt to resolve the existing dispute and for PDC to gain access to the Location and undertake the reclamation work. If the parties have not resolved the existing dispute by December 31st, 2024, then PDC will promptly contact the ECMC to discuss and agree upon appropriate next steps.