

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403824942  
Receive Date:  
06/25/2024  
Report taken by:  
RICK ALLISON

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: <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 #: 33363 Initial Form 27 Document #: 403624680

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

Yes  Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>433753</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Circle B Production Pad 6-66-9</u>	Latitude: <u>40.508050</u>	Longitude: <u>-104.785300</u>	
** correct Lat/Long if needed: Latitude: <u>40.507748</u>		Longitude: <u>-104.785830</u>	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486226</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery</u>	Latitude: <u>40.508037</u>	Longitude: <u>-104.785201</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486287</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery (ASTs)</u>	Latitude: <u>40.507969</u>	Longitude: <u>-104.785651</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486336</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery_AST-DL</u>	Latitude: <u>40.507842</u>	Longitude: <u>-104.785550</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486393</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery_COMP-DL</u>	Latitude: <u>40.508209</u>	Longitude: <u>-104.785299</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486411</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery</u>	Latitude: <u>40.507744</u>	Longitude: <u>-104.785353</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486418</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery_COMPSUC</u>	Latitude: <u>40.507660</u>	Longitude: <u>-104.785703</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agricultural

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? Yes

### Other Potential Receptors within 1/4 mile

Nearest Well: Temporary Dewatering Well - 1,281' NE; Surface Water: Freshwater Pond - 172' S; Occupied Building: 155' NW; Livestock: 147' S; FWS Wetlands: 460' E Riverine (R5UBFx); 100-Year Floodplain 206' E of Tank Battery.

# 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 checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             | _____                                  |
| <input checked="" 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	Refer to Tables & Figures	Lab Analysis and Field Screening
Yes	SOILS	Refer to Tables & Figures	Lab Analysis and Field Screening

## 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 accordance with ECMC Rule 911, this form serves as notification for the completion of decommissioning and abandonment of the Merritt sec 9 production facility. The ground and sub-surfaces was visually inspected for hydrocarbon impacts during equipment decommissioning. In addition, on-site dump lines located between the separator and tank battery were removed by pulling from either end during decommissioning activities. Field observations and photo documentation were recorded in a field inspection form for submittal to the ECMC.

## 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 ):

Grab soil samples were collected below and/or adjacent to applicable facility equipment, as defined in the Rule 911.a.(4) guidance document (9/20/21), for field screening purposes. Discrete soil samples were collected for laboratory analysis either in any area of observed hydrocarbon impacts, or in the sample locations designated by the ECMC. Soil samples were submitted for laboratory analysis of the full Table 915-1 analytical suite by ECMC approved methods.

### Proposed Groundwater Sampling

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

Groundwater was encountered during decommissioning and/or abandonment activities, and four grab samples (GW01-GW04) were collected. The locations where contaminated soil was in contact with groundwater or if free product/hydrocarbon sheen was observed, a release was reported in accordance with Rule 912.b. Groundwater samples were submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene 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 ):

Multiple produced water vessels were observed present and discrete soil samples were collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. The soil samples will be submitted for laboratory analysis of the full Table 915-1 analytical suite by ECMC approved methods. Assessment of off location flowlines were addressed with their respective wellheads under a separate Form 27. During decommissioning activities, additional manifold infrastructure associated with the former Circle B Pad was encountered and located between the Merritt Sec 9 Tank battery location and associated wellhead locations. Appropriate soil samples were collected and submitted for laboratory analysis of the full Table 915-1 analytical suite.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 171  
Number of soil samples exceeding 915-1 82  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 1000

**NA / ND**

-- Highest concentration of TPH (mg/kg) 8260  
-- Highest concentration of SAR 7.78  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 9

**Groundwater**

Number of groundwater samples collected 4  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 4  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 2

-- Highest concentration of Benzene (µg/l) 250  
-- Highest concentration of Toluene (µg/l) 1.8  
-- Highest concentration of Ethylbenzene (µg/l) 240  
-- Highest concentration of Xylene (µg/l) 890  
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?

[Empty text box for impacts]

Were background samples collected as part of this site investigation?

Nineteen background soil sample were collected from 5 locations (BKG01-BKG05) near the tank battery and analyzed for metals in soil per ECMC Table 915-1. Soil samples collected from BKG01-BKG04 were submitted for additional analysis of pH and SAR. Background soil samples were collected from depths ranging between 3 to 8 feet below ground surface (ft bgs). Arsenic, barium, cadmium, lead, nickel, and pH were observed in two background soil samples above ECMC Table 915-1 standards. A detailed discussion of the background sampling results is presented in the Remedial Action/Operator Comments section(s).

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

Volume of solid waste (cubic yards) 155      Volume of liquid waste (barrels) 0

Is further site investigation required?

Source mass removal activities for the release identified at the AST01-DL soil sample location are currently in progress. Confirmation soil samples will be collected from the base and sidewalls of the final excavation extent and analyzed for the ECMC Director's approved COC list.

Source mass removal activities will be conducted to remove organic hydrocarbon exceedances observed at all 7 historic reportable releases at this location. Confirmation soil samples will be collected from the base and sidewalls of the final excavation extents. Based on the concentrations observed during decommissioning activities, PDC requests the analyte list be limited to Table 915-1 organic compounds in soils, TPH(C6-C36), pH, SAR, arsenic, barium, cadmium, lead, and selenium. 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 pH, SAR, arsenic, barium, cadmium, lead, and selenium are attributed to native soil conditions at the site.

**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.

On March 11, 2024, approximately 9 cubic yards of impacted material were removed adjacent to the SEP05-FL excavation. On March 12, 2024, approximately 3 cubic yards were removed adjacent to the SEP03-DL excavation. On March 15, 2024, approximately 120 cubic yards of pea gravel were removed adjacent to the AST containment basin. On March 21, 2024, approximately 6 cubic yards were removed adjacent to the AST-DL02 excavation and approximately 6 cubic yards were removed adjacent to the ASTDL-01 excavation. On March 27, 2024, approximately 3 cubic yards were removed adjacent to the MAN03-DL05-01 excavation. On March 28, 2024, approximately 8 cubic yards were removed adjacent to the MAN04-FL01-01 excavation.

All impacted soils removed from site was transported to North Weld Waste Management in Ault, CO for disposal under PDC waste manifests.

Following the initial confirmation soil sampling of infrastructure within the tank battery containment basin, the pea-gravel fill material was observed to exhibit hydrocarbon staining. Because the containment liner was compromised during confirmation sampling activities, as well as a period of time where the visually impacted pea gravel was present where precipitation could transport impacts to the subsurface, a release was reported, and confirmation soil samples were collected beneath the liner. No organic impacts were observed during the second round of confirmation sampling activities.

The organic compound exceedances will be removed through a remedial excavation. Any hydrocarbon impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

**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.

Based on the Table 915-1 organic compounds in soils, TPH(C6-C36), pH, SAR, arsenic, barium, cadmium, lead, and selenium exceedances identified during decommissioning, PDC proposes to limit future soil sampling to the aforementioned constituents. 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 )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 155

\_\_\_\_\_ 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.

Following excavation activities at this location, groundwater monitoring plan will be developed and implemented until closure criteria are achieved.

# 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 & 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.

- Assessment activities as outlined herein are proposed.

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: \$ 100000

## 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

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

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 conducted in accordance with ECMC 1004 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. 03/08/2024

Proposed date of completion of Reclamation. 06/24/2025

## 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. 10/26/2023

Actual Spill or Release date, or date of discovery. 03/12/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/07/2024

Proposed site investigation commencement. 06/24/2024

Proposed completion of site investigation. 09/30/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/12/2024

Proposed date of completion of Remediation. 09/30/2025

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 Merritt Sec 9 tank battery and necessity for remedial excavation activities adjacent to the tank battery. Remedial excavation activities are currently ongoing or in the process of being scheduled.

## OPERATOR COMMENT

This supplemental form 27 was submitted to summarize the decommissioning and confirmation soil sampling activities conducted at the former Merritt Section 9 Tank Battery.

As a result of the 171 soil samples and 4 groundwater samples collected during this decommissioning, seven historic reportable releases were discovered across tank battery and related infrastructure. The spill IDs, infrastructure types, and relevant sample IDs are described below:

#486226 - Separator ((SEP05-FL-B and WC01)  
#486287 - ASTs (AST01-AST12; AST01-CS - AST12-CS)  
#486336 - AST dump-line (WC05, GW01)  
#486393 - Compressor dump line (WC07)  
#486411 - Compressor suction line (COMP01-SUC01-01-B and COMP01-SUC01-01-S )  
#486418 - Compressor suction line #2 (COMP01-SUC01-02-B and COMP01-SUC01-02-S; GW04)  
#487058 - Flowline Manifold (MAN03-FL02-03, MAN04-DL01-02)

Supplemental form 19 - closure request reports are currently being submitted concurrent to this form 27, to close out the aforementioned ECMC Spill numbers, with work to proceed under the subject remediation project number, 33363, with the exception of Spill #487058.

During decommissioning activities, flowline manifolds were encountered between the Merritt Sec. 9 Tank Battery and related wellhead infrastructure. Confirmation soil samples were consequently collected from this infrastructure. A COA was issued on spill ID #487057 form 19 Document #403772953 requesting for an Initial Form 27 be drafted for Location ID 433654 for the decommissioning of infrastructure on this location and remediation of reported release #487058. An initial form 27 will be submitted for this location, indicating spill ID 487058 will proceed under a remediation project.

A site overview map is included with this submittal, detailing the location of all historic releases encountered during the decommissioning of this location and the nearby Merritt Sec 9 wellheads.

Based on the source material characterization samples collected adjacent to the seven historic reportable releases at the former Merritt Section 9 Tank Battery, PDC requests COCs for this location to include: Table 915-1 organic compounds in soils, TPH(C6-C36), pH, SAR, arsenic, barium, cadmium, lead, and selenium.

Source mass removal activities for the release identified at the AST dump-line location are currently in progress. Confirmation soil samples will be collected from the base and sidewalls of the final excavation extent and analyzed for the ECMC Director's approved COC list. Excavation activities are the selected remedial path forward for the above releases, as necessary

Concurrent or subsequent to the source mass removal activities, additional soil samples will be collected in native material to further evaluate soil suitability for reclamation (SSR) or Table 915-1 metal concentrations in native material.

PDC will continue to provide quarterly timeline updates through the submittal of Supplemental Form 27 reports until closure criteria is achieved.

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: 06/25/2024

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: RICK ALLISON

Date: 07/12/2024

Remediation Project Number: 33363

### 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

403824942	FORM 27-SUPPLEMENTAL-SUBMITTED
403830360	PHOTO DOCUMENTATION
403833152	ANALYTICAL RESULTS
403833153	SOIL SAMPLE LOCATION MAP
403835317	SITE MAP

Total Attach: 5 Files

## General Comments

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

Total: 0 comment(s)