FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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Report taken by:

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 INFORMATON

Name of Operator: PDC ENERGY INC Operator No: 69175
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Karen Olson Email: karen.olson@chevron.com

Phone Numbers
Phone: (303) 860-5800
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 4826 Initial Form 27 Document #: 200222486

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.
- [X] 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: LOCATION Facility ID: 306719 API #: County Name: WELD
Facility Name: BOOTH-64N63W 31NWNW Latitude: 40.274310 Longitude: -104.487470
** correct Lat/Long if needed: Latitude: 40.272719 Longitude: -104.485394
QtrQtr: NWNW Sec: 31 Twp: 4N Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

Location is located in open range. Livestock is present around location.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [ ] Produced Water
  - [X] Oil
  - [ ] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	TBD	Implementation of Site Investigation Plan.

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 July 28, 2008, petroleum hydrocarbon impacts were discovered below the dump lines during routine maintenance at the Booth 11, 12, 21, 22-31U & 31AU tank battery. Following the discovery, an estimated 3,800 cubic yards of impacted material was removed from the source area. The approximate dimensions of the excavation were 40 feet wide by 50 feet long with a depth of 35 feet bgs. Excavation oversight and sampling were conducted by LT Environmental (LTE). Soil sample results indicated that organic compound concentrations were in exceedance of ECMC Table 910-1 standards within the final extent of the excavation.

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):

Five (5) boreholes will be advanced around the former excavation extent to determine the extent of remaining hydrocarbon impacts associated with the July 2008 release (Figure 1). The boreholes will be advanced using hollow stem auger drilling methods. Lithologic descriptions and volatile organic compound (VOC) concentrations measured using a photoionization detector (PID) will be recorded in each borehole. Soil samples will be collected from intervals most likely to be impacted based on visual observations and field measured VOC concentrations. Soil samples will be submitted to Summit Scientific Laboratories (Summit) for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbon (TPH) - gasoline range organics (GRO) by EPA Method 8260B, and TPH - diesel range organics (DRO) by EPA Method 8015. Based on analytical results collected during the site investigation, additional boreholes may be advanced to delineate remaining impacts.

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, monitoring wells will be installed into each borehole and subsequently sampled. Groundwater samples will be submitted to Summit for laboratory analysis of all organic compounds and inorganic parameters per Table 915-1.

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: 25

Number of soil samples exceeeding 915-1: 4

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet): 2900

NA / ND

-- Highest concentration of TPH (mg/kg): 12990

NA Highest concentration of SAR:

BTEX > 915-1: Yes

Vertical Extent > 915-1 (in feet): 49

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?

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

Volume of solid waste (cubic yards): 3800

Volume of liquid waste (barrels): 0

[X] Is further site investigation required?

Per the condition of approval (COA) issued in the approved Supplemental Form 27 (ECMC Document No. 403880715), further site investigation activities are required to reevaluate and delineate the current soil conditions in the area of impact for full Table 915-1 standards. In addition, five monitoring wells will be installed to conduct a full subsurface groundwater investigation to assess if groundwater is impacted. The proposed soil boring and monitoring well locations are illustrated on Figure 2. Following the results of the site assessment, a new remediation strategy will be developed.

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.

Following the discovery of the July 2008 release, an estimated 3,800 cubic yards of impacted material were removed and transported to North Weld Waste Management Facility under PDC waste manifests.

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.

Quarterly vapor samples are collected from the existing SVE well to monitor VOC concentrations and evaluate the passive system operation and efficacy. Monitored natural attenuation (MNA) was selected as the remediation strategy during the second quarter 2019 and will continue as the selected remediation strategy through the first quarter 2025.

Per the condition of approval (COA) issued in the approved Supplemental Form 27 (ECMC Document No. 403880715), further site investigation activities are required to reevaluate and delineate the current soil conditions in the area of impact for full Table 915-1 standards. In addition, five monitoring wells will be installed to conduct a full subsurface groundwater investigation to assess if groundwater is impacted. The proposed soil boring and monitoring well locations are illustrated on Figure 2. Following the results of the site assessment, a new remediation strategy will be developed.

Soil Remediation Summary

[X] In Situ

- [ ] Bioremediation (or enhanced bioremediation)
- [ ] Chemical oxidation
- [ ] Air sparge / Soil vapor extraction
- Yes Natural Attenuation
- [ ] Other

[ ] Ex Situ

- [ ] Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards)
  - 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.

PDC will conduct groundwater monitoring at the five proposed monitoring wells to assess if groundwater is impacted on site. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260B as well as total dissolved solids (TDS), chlorides, and sulfates in accordance with Table 915-1. Monitoring well installation activities will be completed following the approval of this form.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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 [X] 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.

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.

- Investigation and delineation in soil and groundwater is on-going.
- Source mass removal has been partially completed, a passive SVE well has been installed, and soil will continue to be monitored for natural attenuation.
- Facility and infrastructure remain operational and the location will be reclaimed in accordance with the ECMC 1000 Series.

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: $ 45000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 3800

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: North Weld Waste Management

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.

The excavation area was backfilled, re-graded, contoured to match pre-existing site conditions. The facility was reconstructed and remains operational.

Is the described reclamation complete? Yes

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

[X] 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.

Proposed date of completion of Reclamation.

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. 07/28/2008

Actual Spill or Release date, or date of discovery. 07/28/2008

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date).

Proposed site investigation commencement. 12/24/2024

Proposed completion of site investigation. 06/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/28/2008

Proposed date of completion of Remediation. 04/26/2032

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:

Per the condition of approval (COA) issued in the approved Supplemental Form 27 (ECMC Document No. 403880715), further site investigation activities are required to reevaluate and delineate the current soil conditions in the area of impact for full Table 915-1 standards. In addition, five monitoring wells will be installed to conduct a full subsurface groundwater investigation to assess if groundwater is impacted. The proposed soil boring and monitoring well locations are illustrated on Figure 2. Following the results of the site assessment, a new remediation strategy will be developed. The proposed completion of remediation date will be updated following the implementation of the new remediation strategy.

OPERATOR COMMENT

This Supplemental Form 27 was submitted to summarize quarterly remediation activities and analytical results collected during the fourth quarter 2024 at the Booth 11, 12, 21, 22-31U & 31AU tank battery location. The laboratory used to analyze the vapor sample summarized in this form does not currently have encrypted versions of lab reports. PDC is in contact with the laboratory to receive an encrypted version of the lab report attached to this form, and once received, the encrypted lab report will be submitted on a subsequent Supplemental Form 27.

Per the condition of approval (COA) issued in the approved Supplemental Form 27 (ECMC Document No. 403880715), further site investigation activities are required to reevaluate and delineate the current soil conditions in the area of impact for full Table 915-1 standards. In addition, five monitoring wells will be installed to conduct a full subsurface groundwater investigation to assess if groundwater is impacted. The proposed soil boring and monitoring well locations are illustrated on Figure 2. Following the results of the site assessment, a new remediation strategy will be developed.

PDC will conduct groundwater monitoring at the five proposed monitoring wells to assess if groundwater is impacted on site. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260B as well as total dissolved solids (TDS), chlorides, and sulfates in accordance with Table 915-1. Monitoring well installation and supplemental site investigation activities will be completed following the approval of this form.

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

Signed: Mike Medina Title: Environmental Consultant

Submit Date: Email: Tas-Chevron-2@tasman-geo.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: 4826

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
404039446	MONITORING REPORT
404039447	ANALYTICAL RESULTS

Total Attach: 2 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)