

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
404064888

Receive Date:

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 INFORMATION

Name of Operator: PDC ENERGY INC	Operator No: 69175	Phone Numbers
Address: 1099 18TH STREET SUITE 1500		Phone: (303) 860-5800
City: DENVER State: CO Zip: 80202		Mobile: ()
Contact Person: Karen Olson	Email: karen.olson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32673 Initial Form 27 Document #: 403569450

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: WELL	Facility ID: _____	API #: 123-11299	County Name: WELD
Facility Name: BUNN, M. 1-34	Latitude: 40.442782	Longitude: -104.757560	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 34	Twp: 6N	Range: 66W Meridian: 6 Sensitive Area? Yes
Facility Type: OFF-LOCATION FLOWLINE	Facility ID: 471439	API #: _____	County Name: WELD
Facility Name: Wellhead Line 34NESE	Latitude: 40.442011	Longitude: -104.757315	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 34	Twp: 6N	Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486215</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Bunn M 1-34 Wellhead</u>	Latitude: <u>40.442777</u>	Longitude: <u>-104.757545</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>34</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 GW 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

Wellhead:
 Closest Domestic Well within quarter mile – 780' SSE
 Additional Domestic Wells – 870' W, 1120' SSW, 1170' SE
 Nearest Surface Water – Cache La Poudre River 870' NW
 Nearest Occupied Building – 800' SSE
 Additional Occupied Buildings – 1095' SE, 1140' SSW, 1040' SE
 Freshwater Forested/Shrub Wetland – 900' NW
 Freshwater Pond – 530' NW, 890' NW
 100-Year Effective Floodplain – 60' N
 Aquatic Native Species Conservation Waters – 400' NW

No other potential receptors are located within 1/4 mile of the Site
 Above distances are approximations

Additional Flowline Receptors:
 No other potential receptors are located in proximity to the flowline
 Above distances are approximations

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
No	GROUNDWATER	Refer to Tables and Figures	Lab Analysis
Yes	SOILS	Refer to Tables and 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.

On March 7 & 8, 2024, field screening and confirmation soil sampling activities were conducted in accordance with the ECMC Rule 911 during the decommissioning of the Bunn M. 1-34 wellhead and removal of the associated flowline. On March 8, 2024, it was determined that a historic release was discovered at the wellhead when analytical results returned with organic compound exceedances at soil sample location WH01-B. On March 7, 2024, mitigation activities were initiated and to date approximately 9 cubic yards of impacted material were removed from the wellhead excavation and transported to the North Weld Waste Management Facility for disposal under a PDC waste manifest. Due to the location being adjacent to a public park, excavation activities were not re-initiated.

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):

On March 7, 2024, one waste characterization soil sample (WC01) was collected from the wellhead source area at approximately 4 feet below ground surface (bgs). The sample was submitted for laboratory analysis of the full ECMC Table 915-1 analytical suite. Analytical results indicated that site specific COCs include: benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH[C6-C36]), 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, acenaphthene, anthracene, benzanthracene, chrysene, fluoranthene, fluorene, pyrene, 1-methylnaphthalene (M), 2M, arsenic, barium, and selenium.

Proposed Groundwater Sampling

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

If groundwater is encountered during supplemental site investigation activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB 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):

On March 7 & 8, 2024, soil encountered on-site and below production equipment was visually inspected and field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). Due observed hydrocarbon impacts and excavation activities at the wellhead, soil samples (WH01-B & WH01-N) collected from the base and sidewall exhibiting the highest PID response were submitted for analysis of the full Table 915-1 analytical suite. 6 soil samples (FL01-01 - FL01-05 & DL01-01) were collected every 250 feet along the flowline, at the changes in direction, and along a dump line at the tank battery. Soil samples (FL01-01 - FL01-05 & DL01-01) were submitted for laboratory analysis of the full Table 915-1 analytical suite. Analytical results indicated that organic and inorganic compounds were in exceedance of the applicable standards in soil sample WH01-B. Arsenic, barium, lead, and/or pH was in exceedance of the applicable standards in the remaining soil samples.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 36

Number of soil samples exceeding 915-1 12

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 1200

NA / ND

-- Highest concentration of TPH (mg/kg) 22

Highest concentration of SAR

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 14

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 8

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

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?

On March 8, 2024, eight background soil samples were collected from native material topographically up-gradient of the wellhead & tank battery location between depths of approximately 0.5 feet and 4 feet bgs and submitted for laboratory analysis of ECMC Table 915-1 Metals.

On October 2, 2024, three background soil samples were collected near the wellhead and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging between 2.5 to 8 feet below ground surface (ft bgs) and the lithology between the site and background locations were observed to be well graded sands. The maximum background concentrations for pH and SAR were observed to be 7.93 and 6.81, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, lead, and selenium were calculated to be 4.38 mg/kg, 126 mg/kg, 11.1 mg/kg, and 0.331 mg/kg, respectively.

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

Volume of solid waste (cubic yards) 449

Volume of liquid waste (barrels) 730

Is further site investigation required?

Five (5) groundwater monitoring wells will be installed to confirm the absence of dissolved-phase hydrocarbon impacts within and surrounding the wellhead excavation extent. Volatile organic compound (VOC) concentrations using a photoionization detector (PID) and lithologic descriptions will be recorded for each borehole. If elevated VOC concentrations are encountered during the investigation, a sample will be collected from the interval exhibiting the highest VOC concentration from the borehole and analyzed for full ECMC Table 915-1 constituents. Proposed monitoring well locations are illustrated on Figure 3.

Concurrently with the SSI, additional background samples will be collected to determine if pH, arsenic, barium, lead, and selenium are attributed to native soil conditions at the site. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

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.

The sources identified during decommissioning at sample locations WC01@4' & WH01-B@6' were successfully removed through a remedial excavation. The remedial excavation measured 43 feet (ft) long by 40 ft wide and reached a terminal depth of 14 ft below ground surface (bgs). A total of 440 cubic yards (CY) of impacted soil was excavated and transported off-site for disposal at the Waste Management North Weld Landfill.

A total of thirty-six soil samples were collected from the remedial excavation extent and analyzed for full ECMC Table 915-1 constituents by a certified laboratory using approved ECMC laboratory analysis methods. The analytical tables, figures, and laboratory reports from the remedial excavation are attached to this Form 27. A detailed discussion of the excavation results is presented in the Operator Comments section of this Form 27.

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.

On March 8, 2024, a historic release was discovered following receipt of preliminary analytical results from soil samples collected during decommissioning activities at the Bunn M. 1-34 Wellhead. On March 7, 2024, two (2) soil samples (WH01-B & WH01-N) were collected from the base and sidewall exhibiting the highest PID response from the wellhead excavation. On March 8, 2024, six (6) soil samples (FL01-01 - FL01-05 & DL01-01) were collected along the flowline every 250 feet, at the significant direction changes, and along the dump line at the tank battery. Soil samples (FL01-01 - FL01-05) were submitted for laboratory analysis of the full Table 915-1 analytical suite. Analytical results indicated that organic and inorganic compound concentrations were in exceedance of the applicable Table 915-1 standards in the following samples:

WC01: Benzene, ethylbenzene, xylene, 1,2,4 & 1,3,5-TMB, naphthalene, TPH (C6-C36), benzanthracene, 1-M, 2-M, arsenic, barium, & selenium
WH01-B: 1,2,4 & 1,3,5-TMB, TPH (C6-C36), benzanthracene, 1-M, 2-M, & selenium
WH01-N: pH, arsenic, & barium
FL01-01: arsenic & lead
FL01-02, FL01-03, & FL01-05: arsenic
FL01-04: arsenic & barium

Attachments were included on previously submitted and approved Supplemental Form 27 Document# 403812716.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Yes Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 449

_____ 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.

Groundwater was encountered during remedial excavation activities at the wellhead. One grab groundwater sample was collected from within the excavation (GW01) which was submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C. Sulfate was detected in sample GW01 above ECMC Table 915-1 limits.

Five groundwater monitoring wells will be installed during the supplemental site investigation, as shown on the attached Figure 3. The monitoring wells will be sampled on a quarterly basis for the analysis of BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and TDS by Method SM 2540C. Groundwater monitoring will be conducted until four consecutive quarters of compliant groundwater monitoring results has been 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 Supplemental Source Mass Removal Summary & SSI 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.

- Further soil investigation/delineation is required

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: \$ 15000

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:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 449

E&P waste (solid) description Hydrocarbon impacted soils

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management North Weld Landfill

Volume of E&P Waste (liquid) in barrels 730

E&P waste (liquid) description Hydrocarbon impacted groundwater

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: NGL C4

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.

Following wellhead decommissioning and flowline removal activities, the location was backfilled, compacted, and re-contoured to match preexisting conditions. The location will be reclaimed in accordance with the ECMC 1000 series.

Following additional source mass removal activities, the location will be backfilled, compacted, and re-contoured to match preexisting conditions. The location will be reclaimed in accordance with the ECMC 1000 series.

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. 03/07/2024

Proposed date of completion of Reclamation. 03/07/2029

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. 09/11/2023

Actual Spill or Release date, or date of discovery. 03/08/2024

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 01/22/2025

Proposed completion of site investigation. 08/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/01/2024

Proposed date of completion of Remediation. 03/07/2029

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 completion of the October 2024 remedial excavation at the Bunn M 1-34 wellhead and necessity for additional supplemental site investigation activities adjacent to the wellhead. The proposed site investigation will be completed following the approval of this form.

OPERATOR COMMENT

This Form 27 is being submitted to include the results of the October 2024 remedial excavation activities completed at the Bunn M 1-34 Wellhead location. A detailed summary of the remedial excavation activities is presented herein.

The sources identified during decommissioning at sample locations WC01@4' & WH01-B@6' were successfully removed through a remedial excavation. The remedial excavation measured 43 feet (ft) long by 40 ft wide and reached a terminal depth of 14 ft below ground surface (bgs). A total of 440 cubic yards (CY) of impacted soil was excavated and transported off-site for disposal at the Waste Management North Weld Landfill. A total of thirty-six soil samples were collected from the remedial excavation extent and analyzed for full ECMC Table 915-1 constituents by a certified laboratory using approved ECMC laboratory analysis methods. The analytical tables, figures, and laboratory reports from the remedial excavation are attached to this Form 27.

All soil samples collected from the final terminus of the excavation were in compliance with ECMC Table 915-1 standards for organic compounds in soil. Elevated pH was identified in exceedance of ECMC Table 915-1 Soil Suitability for Reclamation (SSR) standards at eight confirmation soil samples collected from the final terminus of the excavation (noting that locations SS11@13' and SS12@13' were over-excavated). While SAR was detected above ECMC Table 915-1 SSR standards at SS23@12', this detection is below local background levels. Concentrations of arsenic and selenium were detected above applicable ECMC Table 915-1 standards and local background levels at locations SS17@8' and SS14@12', respectively. Elevated concentrations of barium (WC01@4'), lead (FL01-01@4'), and selenium (WC01@4' and WH01-B@6') above ECMC Table 915-1 standards and local background levels were successfully removed during the remedial excavation.

As described in the groundwater monitoring section of this Form 27, five monitoring wells will be installed at the site during a direct push drilling investigation. During the well installation, soil will be screened and logged to total depths, and soil samples will be collected from the borings for analysis of full ECMC Table 915-1. These soil samples will be utilized to delineate the elevated pH observed in the final terminus of the remedial excavation above background levels. Concurrently with the well installation, background soil borings will be advanced, and soil samples will be collected and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Additionally, soil borings will be advanced to confirm the abnormally high concentrations of arsenic and selenium at sample locations SS17@8' and SS14@12', respectively.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation will be submitted on a subsequent Form 27.

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

Signed: Allan Engelhardt

Title: Environmental Consultant

Submit Date: _____

Email: Tas-Chevron-3@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: 32673

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
404065946	ANALYTICAL RESULTS
404065947	ANALYTICAL RESULTS
404065948	ANALYTICAL RESULTS
404067038	SITE INVESTIGATION PLAN
404067043	REMEDIATION PROGRESS REPORT

Total Attach: 5 Files

General Comments

User Group

Comment

Comment Date

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

Total: 0 comment(s)