

State of Colorado Energy & Carbon Management Commission

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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: <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>karen.olson@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35084 Initial Form 27 Document #: 403745863

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

☐ No ☐ Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-27135</u>	County Name: <u>WELD</u>
Facility Name: <u>VILLAGE 16A-DU</u>		Latitude: <u>40.401280</u>	Longitude: <u>-104.904640</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWNW</u>	Sec: <u>16</u>	Twp: <u>5N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Riverine 0.08mi N

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Lab analysis and Field Screening, if encountered
Yes	SOILS	Refer to ECMC Document # 403877089	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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the Village 16A-DU wellhead cut and cap and flowline removal. The wellhead was cut and capped per ECMC rules on 06/18/24. A grab soil sample (WH01 @ 6") was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, grab soil samples (WHS01-N @ 0-6", WH01-E @ 5", WH01-S @ 5", WHS01-W @ 0-6") were collected at the N-E-S-W sides of the wellhead. Approximately 134' of flowline was removed on 05/28/24. A laboratory soil sample was collected from beneath the flowline riser at the wellhead (FLR01-W @ 3') and separator (FL01R-S @ 5'). The Form 44 Document number associated with this decommissioning is 403878773.

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):

Sampling was conducted as described in the Initial Action Summary of this Form 27. A grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken at the flowline start and end points, as well as at the midpoint of the flowline. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC 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):

Visual inspection of the wellhead and flowline areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to a previous Form 27 (ECMC Document # 403877089).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 100

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 0.71
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? Yes
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?

Two background soil samples were collected from one discrete location (BKG01) up-gradient of the former wellhead location and analyzed for metals in soil per ECOM Table 915-1, pH, SAR, and EC. Background soil samples were collected from depths of 3 and 5 feet below ground surface (ft bgs). The maximum background concentration for pH was observed to be 9.02. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and lead were calculated to be 7.24 mg/kg, 153 mg/kg, and 11.5 mg/kg, respectively. All pH, arsenic, and barium concentrations observed during decommissioning were below background levels.

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

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

☐ Is further site investigation required?

A supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the lead exceedance observed at sample location FL01R-W @ 3' during decommissioning. Concurrently with the SSI, additional background samples will be collected to determine if lead is attributed to native soil conditions at the site. A proposed SSI map is attached to this Form 27. 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.

No impacted material caused by oil and gas operations was identified at this time.

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.

A supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the lead exceedance observed at sample location FL01R-W @ 3' during decommissioning. Concurrently with the SSI, additional background samples will be collected to determine if lead is attributed to native soil conditions at the site. A proposed SSI map is attached to this Form 27. The SSI will be completed in accordance with the attached proposed site investigation map, and proposed sampling plan outlined in the Site Investigation Report section of this Form 27.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ 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.

Groundwater was not encountered during initial decommissioning activities.

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 1Q25 Timeline Update

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? No

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 in accordance with ECMC 1000 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. 05/28/2024

Proposed date of completion of Reclamation. 06/02/2026

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. 02/05/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/28/2024

Proposed site investigation commencement. 03/29/2025

Proposed completion of site investigation. 07/29/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/29/2025

Proposed date of completion of Remediation. 12/31/2025

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:

'Proposed completion of site investigation' date is being updated to reflect the schedule to complete the supplemental site investigation (SSI). The SSI will be completed in accordance with the implementation schedule. The ECMC will be updated on a subsequent Form 27 with the results of the SSI.

OPERATOR COMMENT

This Form 27 is being submitted as a first quarter 2025 timeline update for the completion of the supplemental site investigation (SSI) at the former Village 16A-DU wellhead and flowline location.

A SSI will be completed to vertically and horizontally delineate the lead exceedance observed during decommissioning. Concurrently with the SSI, additional background samples will be collected to determine if elevated lead is attributed to native soil conditions at the site. A proposed SSI map is attached to this Form 27. The SSI will be completed in accordance with the work plan proposed on the previous Supplemental Form 27 (ECMC Document # 403877089), which was approved on 10/04/2024.

Quarterly reporting will continue until the remediation criteria for this project is achieved. The SSI will be completed in accordance with the implementation schedule. The results of the SSI will be submitted on a subsequent Supplemental Form 27.

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

Signed: Jesse Marcus

Title: Environmental Consultant

Submit Date: _____

Email: Tas-Chevron-5@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: 35084

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

404145903	SITE INVESTIGATION PLAN
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)