

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 INFORMATION

Name of Operator: DCP OPERATING COMPANY LP	Operator No: 4680	Phone Numbers
Address: 2331 CITYWEST BLVD., S812-02		Phone: (303) 619-3042
City: HOUSTON State: TX Zip: 77042		Mobile: ()
Contact Person: Steve Weathers	Email: stephen.weathers@p66.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34876 Initial Form 27 Document #: 403713065

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: Second Quarter 2025 Groundwater Monitoring Summary Report

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 485836	API #: _____	County Name: WELD
Facility Name: CR40 & CR35 (BF-3-2)	Latitude: 40.282966	Longitude: -104.733999	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 25	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

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

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

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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 type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input 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	undetermined	monitoring well and laboratory analysis
Yes	SOILS	7500 sq ft	Field screening and laboratory analysis

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

DCP Operating Company, LP (DCP) was notified in September of 2023 by adjoining tank battery representatives of a possible issue in the area of the gathering system. DCP immediately shut in the gathering line to prevent further potential release until further investigation could be completed. Initial spill response and investigation activities were provided in the approved Form 19-I report doc #403649549 and Form 19-S report doc #403658656. Form 19-S doc #403780946 was submitted to close out the spill number under the remediation project number. Details of remediation activities were presented in the approved Form 27-I report (Doc #403713065) and remediation project #34876 was issued for the site. Monitoring well soil analytical data and the soil boring lithologic logs and well construction details were provided in Form 27-S #403833488. The second quarter 2025 (2Q25) groundwater monitoring event was performed on May 20, 2025, and the results are provided herein.

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):

Between January 9, 2024, and April 18, 2024, a total of 125 grab soil samples were collected from the base and sidewalls of the excavation and from monitoring wells MW01 through MW05. Initial soil sample analytical data were provided in the Form 27-Supplemental Document #403833488. Removal of additional impacted soil left in place was postponed until on site infrastructure is removed. To date, the infrastructure remains in place. DCP is not proposing additional soil sampling or investigation at this time.

Proposed Groundwater Sampling

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

On February 29 and April 18, 2024, five groundwater monitoring wells were installed at the locations illustrated on Figure 2. Second quarter 2025 groundwater monitoring activities were performed on May 20, 2025. The groundwater elevations for the 2Q25 event are presented in Table 1 and a groundwater elevation contour map is provided as Figure 3. Groundwater analytical results are presented in Table 2 and Figure 4, and the laboratory analytical report is provided as a separate attachment. Ongoing groundwater monitoring will continue on a quarterly basis.

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):

Additional investigation activities are not proposed nor anticipated at this time.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 7500

NA / ND

-- Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 13

Groundwater

Number of groundwater samples collected 5
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 5
Number of groundwater monitoring wells installed 5
Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 42.5
ND Highest concentration of Toluene (µg/l) _____
-- Highest concentration of Ethylbenzene (µg/l) 4.28
-- Highest concentration of Xylene (µg/l) 26.8
NA Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
0 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?

A total of 8 background samples were collected from six locations as previously reported. Two of those background samples (TestPit5@10' and TestPit6@10') were collected on the west adjacent property for delineation purposes. Background analytical data were returned with elevated levels of arsenic above the Table 915-1 standards. Based on these data, arsenic concentrations above Table 915-1 standards are naturally occurring at the site. Cross-gradient monitoring well MW02 is considered representative of background conditions for groundwater.

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

Volume of solid waste (cubic yards) 5000 Volume of liquid waste (barrels) 0

Is further site investigation required?

Ongoing groundwater monitoring will continue on a quarterly basis.

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.

Approximately 5,000 cubic yards (CY), or 7,400 tons, of impacted material has been excavated and transported to the Buffalo Ridge Landfill for offsite disposal. Five groundwater monitoring wells have been installed at the locations illustrated on Figure 2 and groundwater monitoring activities will continue on a quarterly basis.

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.

Approximately 5,000 cubic yards (CY) of impacted material were excavated and transported to the Buffalo Ridge Landfill. Five groundwater monitoring wells have been installed at the locations illustrated on Figure 2 and quarterly groundwater monitoring activities will be performed until four consecutive quarters of groundwater monitoring data are below the Table 915-1 standards.

Soil Remediation Summary

In Situ

Ex Situ

<input type="checkbox"/> Bioremediation (or enhanced bioremediation)	Yes	Excavate and offsite disposal
<input type="checkbox"/> Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) <input type="text" value="5000"/>
<input type="checkbox"/> Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or ECMC Facility ID # <input type="text"/>
<input type="checkbox"/> Natural Attenuation	No	Excavate and onsite remediation
<input type="checkbox"/> Other <input type="text"/>		<input type="checkbox"/> Land Treatment
		<input type="checkbox"/> Bioremediation (or enhanced bioremediation)
		<input type="checkbox"/> Chemical oxidation
		<input type="checkbox"/> Other <input type="text"/>

Groundwater Remediation Summary

<input type="checkbox"/> Bioremediation (or enhanced bioremediation)
<input type="checkbox"/> Chemical oxidation
<input type="checkbox"/> Air sparge / Soil vapor extraction
Yes <input type="checkbox"/> Natural Attenuation
<input type="checkbox"/> Other <input type="text"/>

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.

On February 29 and April 18, 2024, five groundwater monitoring wells were installed at the locations illustrated on Figure 2. Second quarter 2025 groundwater monitoring was performed on May 20, 2025. Groundwater monitoring activities include site-wide groundwater gauging and sampling for Table 915-1 parameters. Groundwater levels are measured to evaluate hydraulic characteristics and provide information regarding seasonal fluctuations at the site. Five wells were gauged and sampled using standard groundwater sampling methods and submitted to Pace Analytical for analysis. Approximately 9.5 gallons of purged groundwater water were generated during sampling activities and disposed of at an NGL water disposal facility. Concentrations of Table 915-1 organic constituents were below the ECMC standards and/or the laboratory detection limits at 4 of the 5 sampled locations. One well, MW01, exhibited a benzene concentration above the Table 915-1 standard. Groundwater elevations are presented on Table 1, and a groundwater elevation contour map is provided as Figure 3. The 2Q25 laboratory results are presented on Table 2 and illustrated on Figure 4, and the laboratory analytical report is provided as a separate attachment.

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 _____

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.

DCP maintains appropriate comprehensive general liability insurance to satisfy the requirements of Rule 705.B, with at least \$5MM in coverage and including coverage for sudden and accidental release events. The cost provided below for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. DCP makes no representation or guarantees as the accuracy of the preliminary estimate.

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:

Approximately 5,000 cy of Impacted Soil went to WM - Buffalo Ridge Landfill for Disposal during excavation remediation activities. Approximately 9.5 gallons of purged groundwater water was generated during 2Q25 sampling activities and disposed of at an off-site NGL facility.

Volume of E&P Waste (solid) in cubic yards _____ 5000

E&P waste (solid) description Impacted Soil went to WM - Buffalo Ridge Landfill for Disposal

ECMC Disposal Facility ID #, if applicable: _____ 0

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____ 0

E&P waste (liquid) description Approximately 9.5 gallons of purged groundwater

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Off-site NGL 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 activities are not required at this time as the site is located on an active oil and gas facility. Following completion of the ongoing remedial activities, site surfaces will be re-graded to match existing conditions with landowner and Weld County approval. Final reclamation will be conducted following completion of the soil investigation, groundwater monitoring, and well decommissioning once a no further action determination, and eventual site closure is approved by the ECMC.

Is the described reclamation complete? No _____

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. _____

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. 12/01/2023

Actual Spill or Release date, or date of discovery. 01/09/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/09/2024

Proposed site investigation commencement. 01/09/2024

Proposed completion of site investigation. 04/17/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/29/2024

Proposed date of completion of Remediation. 01/31/2026

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:

OPERATOR COMMENT

This report is being submitted to comply with the quarterly reporting requirement. The 2Q25 groundwater monitoring event was performed on May 20, 2025, and the results have been provided in this Form 27-Supplemental report. Ongoing groundwater monitoring will continue on a quarterly basis.

The laboratory report has been secured and certified upon receipt. The groundwater data report (L1861960) was issued on June 2, 2025, and within the 'Signature Validation Status' it states that Document Certification is valid, signed by Pace Analytical Services, LLC and the document has not been modified since it was certified.

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

Signed: Steve Weathers

Title: Program Manager

Submit Date: _____

Email: ECMCnotification@p66.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: 34876

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

404275336	ANALYTICAL DATA SUMMARY TABLE(S)
404275337	MAP
404275338	LABORATORY ANALYTICAL REPORT

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)