

State of Colorado
Energy & Carbon Management Commission

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404263080
Receive Date:
07/17/2025

Report taken by:
Candice (Nikki) Graber

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>(970) 278-6934</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>Erica Zuniga</u>	Email: <u>ericazuniga@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38713 Initial Form 27 Document #: 404016170

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>123-23143</u>	County Name: <u>WELD</u>
Facility Name: <u>SCHMERGE 44-4</u>	Latitude: <u>40.423140</u>	Longitude: <u>-104.890420</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>4</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 0.15mi W

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
UNDETERMINED	GROUNDWATER	NA	Lab Analysis or Field Screening, if encountered.
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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the Schmerge 44-4 wellhead and flowline removal. The wellhead was cut and capped per ECMC rules on April 3, 2025. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Approximately 540' of flowline was removed on May 1st and 2nd, 2025. Approximately 220' of flowline was ABIP due to conflict with nearby pipelines. The ECMC will be updated in a subsequent Supplemental Form 27 if additional portions of the flowline are able to be removed. Soil samples will be taken along the flowline at any points of directional changes. Additionally, soil samples were collected at the start (FL01-02@5') and end point (FL01R-S@7') of the abandoned portion of flowline. Soil samples were collected at the flowline riser to the wellhead (FL01R-W@4') and the flowline riser to the separator (FL01R-S@7'). The Form 44 document number will be included on a subsequent Form 27. Soil samples were not collected beneath the NE-E or E-NE flowline directional changes along the ABIP portion of the flowline, or field screened along the flowline during initial decommissioning activities, as proposed in the sample location map attached to the IF27 (ECMC Document #404016170).

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):

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 (WH01@6). Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Additionally, soil samples were collected at the start (FL01-02@5') and endpoint (FL01R-S@7') of the abandoned portion of flowline. Soil samples were collected at the flowline riser to the wellhead (FL01R-W@4') and the flowline riser to the separator (FL01R-S@7'). Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

The 8260B GBTEXN 915 analyses were analyzed outside of allotted holding times due to delays at Summit Scientific for soil sample WH01@6 collected on 04/03/2025.

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 flowline and wellhead decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 200

NA / ND

-- Highest concentration of TPH (mg/kg) 9.88

-- Highest concentration of SAR 1.32

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 7

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?

On 05/02/2025, three background soil samples were collected from one discrete location (BKG01) adjacent to the flowline 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 4 to 7 feet below ground surface (ft bgs). The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 7.0 mg/kg, 264 mg/kg, and 0.40 mg/kg, respectively. All arsenic and barium concentrations observed during decommissioning were below 1.25x the maximum 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?

Based on the analytical results collected during decommissioning, a supplemental site investigation (SSI) will be completed to resample to confirm the selenium exceedances observed during decommissioning, as well as collecting a replacement sample for the WH01@6 sample location analyzed outside of hold time. During the SSI, analytical soil samples will be collected at the NE-E or E-NE flowline directional changes along the ABIP portion of the flowline which will be collected for full Table 915-1 analysis. Additionally, soil samples will be collected and field screened from proposed sample locations from the IF27 Map. Concurrently with the SSI, additional background samples to determine if elevated selenium is attributed to native soil conditions on the site. All proposed flowline sample locations were selected based on the approved sampling map attached to the Form 27 Initial (ECMC Document #404016170). A proposed SSI map is attached to this Form 27. During the SSI, soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. 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.

REMEDICATION 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.

Decommissioning analytical results indicated that organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all soil sample locations. Based on the remaining analytes an SSI will be completed to resample to confirm the selenium exceedances observed at FL01R-W@4' and FL01R-S@7' during decommissioning and to collect replacement sample for the WH01@6' sample location analyzed outside of hold time. During the SSI, analytical soil samples will be collected at the NE-E or E-NE flowline directional changes along the ABIP portion of the flowline which will be collected for full Table 915-1 analysis. Additionally, soil samples will be collected and field screened from proposed sample locations from the IF27 Map. All proposed flowline sample locations were selected based on the approved sampling map attached to the Form 27 Initial (ECMC Document #404016170). 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

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ 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 not encountered during the flowline 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 Decommissioning Sample Summary & Supplemental 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.

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. 05/01/2025

Proposed date of completion of Reclamation. 06/30/2027

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. 12/04/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/01/2025

Proposed site investigation commencement. 07/15/2025

Proposed completion of site investigation. 01/15/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/15/2026

Proposed date of completion of Remediation. 07/02/2026

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:

The implementation schedule has been changed due to the decommissioning of the Schmerge 44-4 wellhead/flowline, and necessity for supplemental site investigation activities adjacent to the wellhead and flowline. The proposed site investigation will be completed following the approval of this form.

OPERATOR COMMENT

This Form 27 is being submitted to include the flowline decommissioning results at the former Schmerge 44-4 Wellhead and Flowline location.

Wellhead decommissioning activities occurred at the above referenced location on April 3, 2025, and flowline decommissioning activities occurred from May 1st and May 2nd, 2025. Discrete soil samples were collected from beneath the former facility infrastructure as described in the approved Form 27-Initial (Document #404016170), except soil samples were not collected beneath the NE-E or E-NE flowline directional changes along the ABIP portion of the flowline, or field screened along the flowline during initial decommissioning activities, as proposed in the sample location map attached to the IF27 (ECMC Document #404016170). Flowline decommissioning results indicated that organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all soil sample locations.

Operator was informed by the laboratory that the sample holding times were exceeded for various Table 915-1 constituents. Because not all analytes would be outside of holding times, the lab ran the samples for the full Table 915-1 suite. The full laboratory report (Report) is being transmitted to ECMC for transparency. The Report's case narrative identifies which constituents were run outside of the required holding times. The Report's note column also identifies the impacted constituents. Operator will not be relying on any results associated with a constituent that was outside of the required holding time. Operator will be collecting replacement samples and will be submitting them for analysis. Operator will submit the replacement sample laboratory report in a future supplemental Form 27. The 8260B GBTEX 915 analysis were analyzed outside of allotted holding times due to delays at Summit Scientific for the samples collected during wellhead and flowline decommissioning on 04/03/2025.

On 05/02/2025, three background soil samples were collected from one discrete location (BKG01) adjacent to the flowline 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 4 to 7 feet below ground surface (ft bgs). The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 7.0 mg/kg, 264 mg/kg, and 0.40 mg/kg, respectively. All arsenic and barium concentrations observed during decommissioning were below 1.25x the maximum background levels.

Based on the analytical results collected during decommissioning, an SSI will be completed to resample to confirm the selenium exceedances observed during decommissioning, as well as collecting a replacement sample for the WH01@6 sample location analyzed outside of hold time. During the SSI, analytical soil samples will be collected at the NE-E or E-NE flowline directional changes along the ABIP portion of the flowline which will be collected for full Table 915-1 analysis. Additionally, soil samples will be collected and field screened from proposed sample locations from the IF27 Map. Concurrently with the SSI, additional background samples to determine if elevated selenium is attributed to native soil conditions on the site.

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: Jennifer Skweres

Title: Environmental Consultant

Submit Date: 07/17/2025

Email: jskweres@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: Candice (Nikki) Graber

Date: 07/22/2025

Remediation Project Number: 38713

COA Type

Description

<u>COA Type</u>	<u>Description</u>
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.

<u>Att Doc Num</u>	<u>Name</u>
404263080	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404276551	LABORATORY ANALYTICAL REPORT
404276552	LABORATORY ANALYTICAL REPORT
404278723	LABORATORY ANALYTICAL REPORT
404280412	OTHER
404280717	OTHER
404290140	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Operator will not be relying on any results associated with a constituent that was outside of the required holding time. Operator will be collecting replacement samples and will be submitting them for analysis.	07/22/2025

Total: 1 comment(s)