

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404271289  
Receive Date:  
07/11/2025  
Report taken by:  
Nick Cholas

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>(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 #: 32333 Initial Form 27 Document #: 403546481

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: <u>WELL</u>	Facility ID: _____	API #: <u>123-30880</u>	County Name: <u>WELD</u>
Facility Name: <u>STROHAUER F 33-32D</u>	Latitude: <u>40.353872</u>	Longitude: <u>-104.679936</u>	
** correct Lat/Long if needed: Latitude: <u>40.353862</u>		Longitude: <u>-104.679946</u>	
QtrQtr: <u>NESE</u>	Sec: <u>32</u>	Twp: <u>5N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486157</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Strohauer F 33-32D Wellhead</u>	Latitude: <u>40.352620</u>	Longitude: <u>-104.680386</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>32</u>	Twp: <u>5N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications SM

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**

Nearest Well: Domestic/Irrigation - 775' E; Surface Water: Irrigation Ditch - 151' W; Occupied Building: 613' E; Livestock: 624' ENE; FWS Wetlands: 817' NNE  
Freshwater Pond (PABFx).

Flowline Conflict: Flowline Crosses Irrigation Ditch ~818' SSW of Wellhead.

# 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 and Field Screening, if encountered
Yes	SOILS	Refer to Tables & 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 January 9 & 11, 2024, field screening and confirmation soil sampling activities were conducted in accordance with the ECMC Rule 911 during the decommissioning of the Strohauer F 33-32D wellhead and removal of the associated flowline. On January 29, 2024, it was determined that a historic release was discovered along the flowline when analytical results returned with organic compound exceedances at soil sample location FL01-02. Due to subcontractor availability, excavation activities were unable to be initiated. As such, no soil was removed from the location.

## 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 January 11, 2023, one soil sample (FL01-02) was collected from the flowline 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, anthracene, benzanthracene, benzopyrene, benzo(a)fluoranthene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, fluoranthene, indenopyrene, and pyrene.

### 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, grab groundwater samples 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 ):

On January 9 & 11, 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). Per the approved proposed soil sampling plan, two soil samples (WH01 & FLR01) were collected below the wellhead & flowline riser at approximately 6 ft & 4 ft bgs, respectively, and submitted for laboratory analysis of the full Table 915-1 analytical suite. Six (6) additional soil samples (FL01-01, FL01-03 - FL01-06, FLR02) were collected every 250 feet along the flowline, at the changes in direction, and underneath the flowline riser at the separator. Soil samples (FL01-04 - FL01-06 & FLR02) were submitted for laboratory analysis of the full Table 915-1 analytical suite. Analytical results indicated that all compound concentrations were within the acceptable Table 915-1 standards or below background concentrations, except for pH & barium in WH01; barium & lead in FLR01.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 7  
Number of soil samples exceeding 915-1 3  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 300

### NA / ND

-- Highest concentration of TPH (mg/kg) 183  
-- Highest concentration of SAR 1.62  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 6

### 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 01/09/2024, six background soil samples were collected from two discrete locations (BKG01 and BKG02) near the wellhead and analyzed for metals in soil per ECMC Table 915-1 and pH. On 10/17/2023, 24 background soil samples were collected from four discrete locations (BKG02-BKG05) adjacent to the Bostron 32-3 Wellhead (REM# 26573) and analyzed for metals per ECMC Table 915-1. Background samples were collected from depths ranging between 4 to 8 feet below ground surface (ft bgs). The maximum background concentrations for pH was observed to be 8.55. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and lead were calculated to be 4.64 mg/kg, 114 mg/kg, and 47.6 mg/kg, respectively. All arsenic 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?

Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, background soil samples will be collected to determine if pH, barium, and lead are attributed to native soil conditions at the site. The proposed soil sample locations are shown on the proposed excavation map attached to Form 27 #404154560.

## 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 benzo(a)anthracene exceedance observed at sample location FL01-02@4' will be removed through a remedial excavation.

### 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.

A remedial excavation will be completed to remove the benz(a)anthracene compound exceedances observed at sample locations FL01-02@4' during decommissioning. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The results of the remedial excavation will be submitted on a subsequent 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 decommissioning of the wellhead and removal of the flowline.

# 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 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
- Source removal activities are 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: \$ 50000

## 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? No

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 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. 01/09/2024

Proposed date of completion of Reclamation. 10/14/2026

## 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. 08/15/2023

Actual Spill or Release date, or date of discovery. 01/23/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/20/2023

Proposed site investigation commencement. 04/14/2025

Proposed completion of site investigation. 10/14/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/14/2025

Proposed date of completion of Remediation. 04/14/2026

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 not changed from the schedule proposed in previous Form 27 #404154560, which is still pending approval as of the submission of this report. The proposed remedial excavation is tentatively scheduled to be completed in fourth quarter 2025. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

**OPERATOR COMMENT**

This Form 27 is being submitted as a 3Q25 timeline update for the remedial excavation at the Strohauser F33-32D wellhead and flowline location.

The implementation schedule has not changed from the schedule proposed in previous Form 27 #404154560, which is still pending approval as of the submission of this report. The proposed remedial excavation is tentatively scheduled to be completed in fourth quarter 2025. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

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

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

Signed: Andy Sagen

Title: Environmental Consultant

Submit Date: 07/11/2025

Email: asagen@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: Nick Cholas

Date: 08/04/2025

Remediation Project Number: 32333

**COA Type**

**Description**

	ECMC has processed this form as an update; no analytical was attached thus approval of this form does not imply any agreement with comments on completion of site investigation. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
	Operator shall provide a NRCS map showing all sample points, the distance from the site that the background samples were taken, soil type, and a confirmation of the same land use. Operator shall also provide original laboratory analytical reports.
2 COAs	

**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**

404271289	FORM 27-SUPPLEMENTAL-SUBMITTED
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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)