

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:  
404291517  
Receive Date:  
08/05/2025  
Report taken by:  
RICK ALLISON

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>(832) 349-0757</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>Lauren Hoff</u>	Email: <u>lauren.hoff@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33363 Initial Form 27 Document #: 403624680

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>LOCATION</u>	Facility ID: <u>433753</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Circle B Production Pad 6-66-9</u>	Latitude: <u>40.508050</u>	Longitude: <u>-104.785300</u>	
** correct Lat/Long if needed: Latitude: <u>40.507748</u>		Longitude: <u>-104.785830</u>	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486226</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery</u>	Latitude: <u>40.508037</u>	Longitude: <u>-104.785201</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486287</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery (ASTs)</u>	Latitude: <u>40.507969</u>	Longitude: <u>-104.785651</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486336</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery_AST-DL</u>	Latitude: <u>40.507842</u>	Longitude: <u>-104.785550</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486393</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery_COMP-DL</u>	Latitude: <u>40.508209</u>	Longitude: <u>-104.785299</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486411</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery</u>	Latitude: <u>40.507744</u>	Longitude: <u>-104.785353</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>6N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486418</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Merritt Sec. 9 Tank Battery_COMPSUC</u>	Latitude: <u>40.507660</u>	Longitude: <u>-104.785703</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>9</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 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: Temporary Dewatering Well - 1,281' NE; Surface Water: Freshwater Pond - 172' S; Occupied Building: 155' NW; Livestock: 147' S; FWS Wetlands: 460' E Riverine (R5UBFx); 100-Year Floodplain 206' E of Tank Battery.

# 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
Yes	GROUNDWATER	Refer to Tables & Figures	Lab Analysis and Field Screening
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.

In accordance with ECMC Rule 911, this form serves as notification for the completion of decommissioning and abandonment of the Merritt sec 9 production facility. The ground and sub-surfaces was visually inspected for hydrocarbon impacts during equipment decommissioning. In addition, on-site dump lines located between the separator and tank battery were removed by pulling from either end during decommissioning activities. Field observations and photo documentation were recorded in a field inspection form for submittal to the ECMC.

## 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 ):

Grab soil samples were collected below and/or adjacent to applicable facility equipment, as defined in the Rule 911.a.(4) guidance document (9/20/21), for field screening purposes. Discrete soil samples were collected for laboratory analysis either in any area of observed hydrocarbon impacts, or in the sample locations designated by the ECMC. Soil samples were submitted for laboratory analysis of the full Table 915-1 analytical suite by ECMC approved methods.

### Proposed Groundwater Sampling

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

Groundwater was encountered during decommissioning and excavation activities, and six grab samples (GW01-GW06) were collected. The locations where contaminated soil was in contact with groundwater or if free product/hydrocarbon sheen was observed, a release was reported in accordance with Rule 912.b. Groundwater samples were submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene 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 ):

Per landowner request, three surface water samples (PS-01 - PS-03) were collected from the pond to the southwest of the former tank battery location and submitted for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

## Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

Multiple produced water vessels were observed present and discrete soil samples were collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. The soil samples will be submitted for laboratory analysis of the full Table 915-1 analytical suite by ECMC approved methods. Assessment of off location flowlines were addressed with their respective wellheads under a separate Form 27. During decommissioning activities, additional manifold infrastructure associated with the former Circle B Pad was encountered and located between the Merritt Sec 9 Tank battery location and associated wellhead locations. Appropriate soil samples were collected and submitted for laboratory analysis of the full Table 915-1 analytical suite.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 78  
Number of soil samples exceeding 915-1 5  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 26520

**NA / ND**

-- Highest concentration of TPH (mg/kg) 964  
-- Highest concentration of SAR 7.78  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 9

**Groundwater**

Number of groundwater samples collected 6  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 4  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 2

-- Highest concentration of Benzene (µg/l) 250  
-- Highest concentration of Toluene (µg/l) 1.8  
-- Highest concentration of Ethylbenzene (µg/l) 240  
-- Highest concentration of Xylene (µg/l) 890  
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?

Empty text box for response to impact question.

Were background samples collected as part of this site investigation?

Sixteen background soil sample were collected from 4 locations (BKG01-BKG04) near the tank battery and analyzed for metals, pH, and SAR in soil per ECMC Table 915-1. Background soil samples were collected from depths ranging between 3 to 8 feet below ground surface (ft bgs) and the lithology between site and background locations was observed to be silty sand. The maximum background concentration for pH was observed to be 8.55. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, and lead were calculated to be 22.5 mg/kg, 533 mg/kg, 0.846 mg/kg, and 30.1 mg/kg, respectively.

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

Volume of solid waste (cubic yards) 7165      Volume of liquid waste (barrels) 23795

Is further site investigation required?

Twenty-seven (27) groundwater monitoring wells will be installed to monitor dissolved-phase hydrocarbon impacts in groundwater adjacent to and surrounding the final excavation extent. (GW01 - GW06).

**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.

On March 11, 2024, approximately 9 cubic yards (cy) of impacted material were removed adjacent to the SEP05-FL excavation. On March 12, 2024, approximately 3 cy were removed adjacent to the SEP03-DL excavation. On March 15, 2024, approximately 120 cy of pea gravel were removed adjacent to the AST containment basin. On March 21, 2024, approximately 6 cubic yards were removed adjacent to the AST-DL02 excavation and approximately 6 cy were removed adjacent to the ASTDL-01 excavation. On March 27, 2024, approximately 3 cy were removed adjacent to the MAN03-DL05-01 excavation. On March 28, 2024, approximately 8 cy were removed adjacent to the MAN04-FL01-01 excavation.

Between May 20 & 21, 2024, approximately 130 cy were removed adjacent to the SEP05-FL ("A") excavation. On July 22, 2024, approximately 40 cy were removed adjacent to the Compressor dump line ("C") excavation. Between May 20, 2024 and January 13, 2025, approximately 9,201 cy were removed adjacent to the AST riser, AST dump-line, Compressor Suction Line, and Compressor Suction line #2 ("B") excavation.

All impacted soils removed from site were transported to North Weld Waste Management in Ault, CO for disposal under PDC waste manifests.

The remaining organic compound exceedances will be removed through a remedial excavation. Any hydrocarbon impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

**REMIEDIATION 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.

Remedial excavation B was conducted between May 21, 2024 and January 13, 2025 to remove organic impacts. 161 confirmation soil samples (B-SS01-BSS03, B-SS05-BSS162) were collected from the base and sidewalls of the excavation extent. One soil sample (B-SS04) was collected to analyze soil suitability for reclamation. Analytical results from soil samples collected from the final B excavation extent indicated organic compounds were below ECMC Table 915-1 standards, except for the 1-methylnaphthalene exceedance observed in soil sample B-SS144@8.5'. Additional excavation activities were conducted on May 19, 2025 to remove the 1-methylnaphthalene exceedance observed in soil sample B-SS144@8.5'. One additional soil sample (B-SS163) was collected and submitted for analysis of the full Table 915-1 suite. Analytical results indicated that organic compounds were below ECMC Table 915-1 standards. pH, barium, and selenium remain above ECMC standards in soil samples collected from the final excavation extents.

A supplemental site investigation was conducted on March 21, 2025, to delineate the organic exceedance in soil sample B-SS144@8.5'. Soil boring SB09 was advanced in the same location as B-SS144@8.5', and soil borings BH10 and BH11 were advanced to the west of the former sample location to verify the underground culvert did not act as a preferential pathway downgradient of the final excavation extent. Five soil samples were collected at depths ranging from 4 to 9 ft bgs, and analytical results indicated organic compounds were below ECMC Table 915-1 standards.

Twenty-seven (27) groundwater monitoring wells will be installed to monitor dissolved-phase hydrocarbon impacts in groundwater adjacent to and surrounding the final excavation extent. (GW01 - GW06). Following installation and sampling of the proposed monitoring wells, a remediation strategy for the groundwater impacts will be selected.

### Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 9526

\_\_\_\_\_ 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 monitoring will be conducted on a quarterly basis at the 27 proposed site monitoring wells until closure criteria are met. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C in accordance with Table 915-1.

# 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 & 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.

- Assessment activities as outlined herein are proposed.

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: \$ 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:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 9526

E&P waste (solid) description Hydrocarbon impacted soils

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: North Weld Waste Management

Volume of E&P Waste (liquid) in barrels 23795

E&P waste (liquid) description Groundwater

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: NGL C10

# 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 conducted in accordance with ECMC 1004 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. 03/08/2024

Proposed date of completion of Reclamation. 12/31/2026

## 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. 10/26/2023

Actual Spill or Release date, or date of discovery. 03/12/2024

### SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 03/21/2025

Proposed completion of site investigation. 03/21/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/23/2025

Proposed date of completion of Remediation. 07/23/2026

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 completion of the site investigation at the Merritt Sec 9 tank battery and necessity for additional remedial excavation activities and native material assessment adjacent to the tank battery. The remedial excavation will be completed following approval of this form.

## OPERATOR COMMENT

This Form 27 is being submitted to include the results for the remedial excavation conducted during the second quarter 2025 at the former Merritt Sec 9 Tank Battery location.

Remedial excavation B was conducted between May 21, 2024 and January 13, 2025 to remove organic impacts. 161 confirmation soil samples (B-SS01-BSS03, B-SS05-BSS162) were collected from the base and sidewalls of the excavation extent. One soil sample (B-SS04) was collected to analyze soil suitability for reclamation. Analytical results from soil samples collected from the final B excavation extent indicated organic compounds were below ECMC Table 915-1 standards, except for the 1-methylnaphthalene exceedance observed in soil sample B-SS144@8.5'. Additional excavation activities were conducted on May 19, 2025 to remove the 1-methylnaphthalene exceedance observed in soil sample B-SS144@8.5'. One additional soil sample (B-SS163) was collected and submitted for analysis of the full Table 915-1 suite. Analytical results indicated that organic compounds were below ECMC Table 915-1 standards. pH, barium, and selenium remain above ECMC standards in soil samples collected from the final excavation extents.

Twenty-seven (27) groundwater monitoring wells will be installed to monitor dissolved-phase hydrocarbon impacts in groundwater adjacent to and surrounding the final excavation extent. (GW01 - GW06). Following installation and sampling of the proposed monitoring wells, a remediation strategy for the groundwater impacts will be selected.

Groundwater monitoring will be conducted on a quarterly basis at the 27 proposed site monitoring wells until closure criteria are met. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C in accordance with Table 915-1.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. Final analytical results 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: Ben Wagner

Title: Environmental Consultant

Submit Date: 08/05/2025

Email: bwagner@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: RICK ALLISON

Date: 09/11/2025

Remediation Project Number: 33363

## COA Type

## Description

	pH in soil appears to have been analyzed several days after preparation/extraction. pH at several confirmation soil sample locations exceeds the Table 915-1 soil suitability for reclamation standard. Operator shall confirm pH results in soil around edges of excavations during monitoring well installation.
	Operator shall analyze groundwater samples for 1-Methylnaphthalene and 2-Methylnaphthalene.
	Operator shall analyze groundwater samples for dissolved barium and dissolved selenium.
	Operator shall install groundwater monitoring wells near the separator release "A" excavation and near the Compressor Dumpline "C" excavation.
	Operator shall justify use of the highest background concentration for metals (BKG01@5').
	Operator shall implement the proposed workplan upon approval of this form and continue quarterly reporting.
	Operator shall provide results of the pond water sampling.

7 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

404291517	FORM 27-SUPPLEMENTAL-SUBMITTED
404304563	ANALYTICAL RESULTS
404305414	SITE INVESTIGATION REPORT

Total Attach: 3 Files

Date Run: 9/11/2025 Doc [#404291517]

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## General Comments

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

Total: 0 comment(s)