

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404273960  
Receive Date:  
07/10/2025

Report taken by:  
Abdul Elnajdi

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: PDC ENERGY INC	Operator No: 69175	Phone Numbers Phone: (970) 313-5582 Mobile: ( )
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Karen Olson	Email: karen.olson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36082 Initial Form 27 Document #: 403837584

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: _____	Facility ID: _____	API #: _____	County Name: _____
Facility Name: _____	Latitude: _____	Longitude: _____	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: _____	Sec: _____	Twp: _____	Range: _____
		Meridian: _____	Sensitive Area? _____

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Rangeland  
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No  
Is groundwater less than 20 feet below ground surface? No

**Other Potential Receptors within 1/4 mile**

Stock well present 655 ft NE  
Livestock within 1/4 mile- Cattle barn in place 910 ft NW  
Oil and Gas Production Operations within 1/4 mile- 569 ft NE, 905' NW, 1038 ft SE, 1146 ft SW, 1409 ft W

No other potential receptors are located within 1/4 mile of the Site.  
Above distances are approximations.

**SITE INVESTIGATION PLAN**

**TYPE OF WASTE:**

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

**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	15' x 30' x 1' bgs (hydrocarbons)	Confirmation soil sampling

**INITIAL ACTION SUMMARY**

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

A release of approximately 2 bbls of production fluid within lined secondary containment was discovered on 4/1/2024 at the Wells Ranch 34f-212 tank battery. While loading, a contracted driver stepped away from the bucket and left the valve on the load out bucket open causing the release. Upon discovery, the facility was shut in and clean up operations commenced. Approximately 20 cubic yards of soil were excavated via hydrovac equipment.

**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 ):

[Empty text box for soil sampling details]

**Proposed Groundwater Sampling**

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

[Empty text box for groundwater sampling details]

**Proposed Surface Water Sampling**

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

[Empty text box for surface water sampling details]

**Additional Investigative Actions**

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

[Empty text box for additional investigative actions]

**SITE INVESTIGATION REPORT**

**SAMPLE SUMMARY**

**Soil**

Number of soil samples collected 4  
Number of soil samples exceeding 915-1 4  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 450

**NA / ND**

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 0.279  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 1

**Groundwater**

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
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?

Nine background samples were collected including one within the imported material of the lined secondary containment. Laboratory data is provided on Tables 3 and 4 and illustrated on Figure 4.

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?

\_\_\_\_\_

**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 4/1/2024, hydrovac equipment was used to remove impacted soil adjacent to the loading bucket. The initial amount of soil removed was less than 10 cubic yards (CY). Laboratory analyses indicated that additional excavation was required to remove petroleum-impacted soil. On 5/7/2024, it was determined that approximately 10 CY of impacted soil had been removed; therefore, a Form 19 Spill Report was submitted to ECOM. As shown on Tables 1, 2, 3 and 4, soil samples were collected for analyses on 4/19/2024, 4/26/2024, 5/21/2024 and 6/5/2024. The soil samples collected on 6/5/2024 indicated that all petroleum-impacted soil had been adequately remediated. A total of approximately 20 CY of impacted material was transported for disposal to Republic Services Tower Road landfill in Commerce City, Colorado in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

**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.

As described in the Source Removal Summary tab, petroleum-impacted soil has been adequately remediated. However, non-compliant concentrations of pH, EC, SAR, arsenic, barium, cadmium, lead, and selenium are present.

As shown on Table 4, all Table 915-1 metals concentrations have been resolved based on comparison to 125% of background concentrations.

SAR, EC and/or pH were elevated in several samples in the former spill area. Delineation of the extent of SSR constituents has been completed as proposed in ECMC-approved Form 27 Doc #404055119.

Therefore, PDC requests that those SSR impacts be left in place via a Reclamation Plan in accordance with ECMC Rule 915.b. This Reclamation Plan will be submitted in a future Supplemental Form 27.

### Soil Remediation Summary

In Situ

Ex Situ

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

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

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

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 20

\_\_\_\_\_ 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 site investigation or remediation activities at the Site.

# 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 Site Investigation Report

## 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.

- Source mass removal has been completed.
- Delineation activities have been completed.
- PDC proposes that SAR, EC and pH exceedances be left in place, within the lined secondary containment structure, and addressed with a Reclamation Plan to be submitted with the next quarterly Supplemental Form 27.

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: \$ 2500

## 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 20

E&P waste (solid) description Hydrocarbon Impacted Soil

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

Non-ECMC Disposal Facility: Republic Services Tower Road  
Landfill in Commerce City, CO

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

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.

The Wells Ranch 34F-212 Facility is an active facility and there are no current plans for decommissioning or reclamation activities. A Reclamation Plan will be developed in accordance with ECMC Rule 915.b to address pH and SAR levels above Table 915-1 standards encountered in the bedding material within lined secondary containment.

Is the described reclamation complete? \_\_\_\_\_

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. 05/08/2024

Actual Spill or Release date, or date of discovery. 04/01/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/01/2024

Proposed site investigation commencement. 04/02/2024

Proposed completion of site investigation. 06/30/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/02/2024

Proposed date of completion of Remediation. 06/05/2024

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 form serves to comply with the Rule 913.e. reporting schedule for the Wells Ranch 34F-212 release site.

Delineation of the extent of SSR constituents has been completed in ECMC-approved Form 27 Doc #404055119 dated 2/6/2025.

Therefore, PDC requested that those SSR impacts be left in place via a Reclamation Plan in accordance with ECMC Rule 915.b. This approach was approved in Form 27 Doc #404160337 dated 4/11/25. This Reclamation Plan will be submitted in a future Supplemental Form 27.

If the Reclamation Plan is approved, PDC will request a no further action determination.

Supplemental Form 27s will be prepared and submitted on a quarterly schedule to provide updates and progress of the remediation until closure criteria has been achieved.

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

Signed: Paul Henehan Title: Consultant  
 Submit Date: 07/10/2025 Email: paulh@fremontenv.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: 36082

<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>
404273960	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

**General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location.</p> <p>Per Rule 912.a.(1-2): Immediately upon discovering any Spills or Releases of E&amp;P Waste, produced Fluids, or unauthorized Releases of natural gas that meet the criteria of Rules 912.b.(1).H, I, or J, regardless of size or volume, Operators will control and contain the Spill or Release to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and should request expedited review if necessary.</p> <p>Operator shall conduct work in compliance with previously approved workplans and the 900 Series Rules. In accordanc</p>	10/27/2025

Total: 1 comment(s)