

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404416928

Receive Date:

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9353 Initial Form 27 Document #: 200437992

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: Third Quarter 2025 Groundwater Monitoring Summary Report

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>GAS COMPRESSOR STATION</u>	Facility ID: <u>422082</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>TAMPA COMPRESSOR STATION</u>	Latitude: <u>40.176300</u>	Longitude: <u>-104.489400</u>	
	** correct Lat/Long if needed: Latitude: <u>40.176587</u>	Longitude: <u>-104.489836</u>	
QtrQtr: <u>SW</u>	Sec: <u>31</u>	Twp: <u>3N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <input type="checkbox"/> No

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use PASTURE

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

Livestock and domestic wells located 1/4 mile of release.

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) Petroleum hydrocarbon impacted groundwater

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	See Approved F27S Report & Figures	Groundwater sampling
No	SOILS	See Approved F27S Report & Figures	Lab 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.

Initial actions and completed remedial measures have previously been submitted to the ECMC in the Form 19 Initial document #400785370 dated February 3, 2015, Form 19 Supplemental document #40078873 and #400930163 dated February 10 and November 11, 2015, respectively. A Form 27 Site Investigation and Remediation Work Plan (Document #400927294) approved November 18, 2015, detailed completed excavation activities and the installation of monitoring well locations to further delineate the extent of impacts to groundwater. The ECMC issued Spill tracking facility ID# 440770 and remediation project #9353 for the Site. Previous remediation efforts have included excavation of impacted soils, installation of twelve (12) groundwater monitoring well locations, and vacuum enhanced fluid recovery (EFR) remediation activities. Ongoing groundwater monitoring has been performed at the Site on a quarterly basis and summarized in approved Form 27-S workplans. Details of the third quarter 2025 (3Q25) groundwater monitoring event are provided within this Form 27 submittal which includes a recertified secured laboratory analytical report that was originally provided with the 3Q25 F27-S #404362166 but was denied on 10/13/25. Additional information on the denied report is provided in the Operator Comments section of this report.

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):

Based on the information presented in the approved F27-S document #402591732, any impacted soil on site has been delineated and excavated.

In response to the COA in Form 27-S #404013700, one additional monitoring well location is proposed at the location on Figure 5 to achieve point of compliance upgradient and southwest of monitoring wells BH04, BH05, and BH06. Soil samples will be collected from the soil borings during installation from the interval with the highest PID reading and from the terminal depth of the soil boring for laboratory analysis of the full Table 915-1 list of analytes.

Proposed Groundwater Sampling

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

Twelve (12) groundwater monitoring wells were installed at the Site to monitor dissolved phase hydrocarbon impacts to groundwater. Ongoing quarterly groundwater monitoring has been performed at the Site at well locations illustrated on the attached Figure 2.

One additional monitoring well location is proposed in the location on Figure 5. The proposed well will be incorporated into the sampling plan subsequent to installation.

The third quarter groundwater monitoring event was conducted on August 14, 2025. Groundwater samples are submitted for laboratory analysis of the ECMC Table 915-1 Organic Compounds in Groundwater, and groundwater monitoring will continue until four consecutive quarterly monitoring events are below ECMC Table 915-1 standards. Subsequently, a no-further-action (NFA) determination for the Site will be requested from the ECMC.

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):

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) 700

NA / ND

NA Highest concentration of TPH (mg/kg) _____

NA Highest concentration of SAR _____

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 12

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 9

Number of groundwater monitoring wells installed 12

Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 1.7

ND Highest concentration of Toluene (µg/l) _____

-- Highest concentration of Ethylbenzene (µg/l) 615

-- Highest concentration of Xylene (µg/l) 2440

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?

Were background samples collected as part of this site investigation?

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.

As previously reported in the Form 27 Remediation Work Plan, initial source remediation efforts performed February 2, 2015, removed surface-stained soils via Hydrovac excavation methods. Between May 6 and 22, 2015 an additional 210 cubic yards of impacted soil and 33 barrels (bbls) of groundwater were removed from the Site. In the northwest corner of the Site, in-situ remediation activities were performed to address impacts to soils within the vadose zone that was inaccessible due to facility infrastructure. Twelve (12) monitoring wells have been installed to delineate petroleum hydrocarbon impacts to groundwater. Between April 28, 2015, and May 17, 2017, regular EFR remediation activities were performed, removing approximately 1,188 bbls of additional impacted groundwater from the Site. As presented in the approved F27-S document #402656483, the building demolition and soil remediation activities performed between 8/21/2020 and 9/30/2020 removed approximately 1,176 cubic yards (cy) of impacted material for off-site disposal. In addition, and per the landowner's request, soil material and overburden that was below the ECMC standards but exhibited discoloration was removed from the site during the third quarter 2021 and backfilled per landowner specifications.

REMIATION 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.

In addition to the source removal remediation activities described above, air sparge (AS) and soil vapor extraction (SVE) activities were performed at the Site between August 29, 2017, and February 7, 2018. Active remedial efforts were discontinued to evaluate subsurface conditions without the influence of active remediation. Ongoing groundwater monitoring has been performed at the Site on a quarterly basis through 3Q25. The site is currently on a quarterly groundwater sampling frequency until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below ECMC Table 915-1 standards. At that time, an NFA determination for the Site will be requested from the ECMC. Third quarter 2025 groundwater monitoring activities are further described in the following groundwater monitoring section.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- _____ 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.

Site-wide groundwater sampling has been conducted on a quarterly basis at the 12 monitoring well locations illustrated on the attached Figure 2. During the 3Q25 monitoring event, performed on August 14, 2025, groundwater levels and samples were collected from all 12 well locations using standard hand-bailing sampling methods, and were submitted to Pace Analytical Laboratory for analysis of Table 915-1 organic parameters using USEPA method 8260D. Groundwater elevations and flow trends are presented in Table 1 and illustrated in Figure 3. Third quarter 2025 laboratory analytical data is summarized in Table 2 and on Figure 4, historical groundwater data is summarized in Table 3, and the laboratory analytical report is included as a separate attachment. During the 3Q25, concentrations of total xylenes, 1,2,4-trimethylbenzene (TMB), and/or 1,3,5-TMB were observed above the ECMC Table 915-1 standards at one well location (BH06). Due to dilution, the reported detection limit for BH06 benzene concentration in 3Q25 was higher than the Table 915-1 standard for benzene.

One additional monitoring well location is proposed at the location illustrated on Figure 5. The proposed well will be incorporated into the sampling plan subsequent to installation.

Groundwater monitoring will continue until four consecutive quarterly monitoring events are below ECMC Table 915-1 standards. At that time, an NFA determination for the Site will be requested from the ECMC.

Is additional groundwater monitoring to be conducted? Yes

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.

Groundwater impacts and monitoring are associated with an inactive former compressor station. Following the completion of onsite decommissioning activities in 2020, the ECMC approved Form 27-S document #402591732. DCP continues to work with the landowner and an access road for remaining oil and gas infrastructure has been completed with landowner approval and the area has been backfilled, regraded, and reseeded with landowner and ECMC approval. No further reclamation activities are planned at this time.

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____

Proposed site investigation commencement. 02/02/2015

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/06/2015

Proposed date of completion of Remediation. 12/31/2024

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

DCP will continue to complete routine groundwater monitoring, and the details will be presented to the ECMC in subsequent Form 27-S reports. With ECMC approval of the site-specific groundwater analysis and sampling plan in document #402656483, DCP will continue the groundwater monitoring of organic parameters listed in Table 915-1.

Based on the results of recent groundwater monitoring events and in response to the COA in Form 27-S #404013700, one additional monitoring well location is proposed at the location illustrated on Figure 5 to achieve a point of compliance upgradient and southwest of monitoring wells BH04, BH05, and BH06. Soil samples will be collected from the soil borings during installation from the interval with the highest PID reading and from the terminal depth of the soil boring. Soil samples will be submitted for full Table 915-1 analysis. With approval from the ECMC and landowner, DCP will schedule the work accordingly.

Groundwater monitoring will continue until four consecutive quarterly monitoring events are below ECMC Table 915-1 standards. At that time, an NFA determination for the Site will be requested from the ECMC.

The Pace Analytical Laboratory groundwater analytical report #L1889481 associated with the denied 3Q25 Form 27-S report #404362166 is provided as a separate attachment. The laboratory report was originally issued on 8/27/2025 but was not secured and certified per ECMC requirements and this report is being submitted in response to the general comment in denied Form 27-S. In accordance with directive from the ECMC, the attached laboratory analytical report was reissued in October 2025 and has been secured and certified per ECMC requirements and includes a report revision history and project narrative to document the report history timeline. Within the 'Signature Validation Status' it states that Document Certification is valid and signed by Pace Analytical Services, LLC certifying that the data is valid and has not been altered since the report was created. The modification information presented in the reissued report documents the timeframe between the original creation timestamp and certification timestamp.

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

Signed: Steve Weathers

Title: Senior Specialist

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: 9353

COA Type

Description

0 COA	
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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

404416930	LABORATORY ANALYTICAL REPORT
404416931	OTHER
404416932	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)