FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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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 INFORMATON

Name of Operator: DCP OPERATING COMPANY LP Operator No: 4680
Address: 2331 CITYWEST BLVD., S812-02
City: HOUSTON State: TX Zip: 77042
Contact Person: Steve Weathers Email: stephen.weathers@p66.com

Phone Numbers
Phone: (303) 619-3042
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 14898 Initial Form 27 Document #: 402282471

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.
- [X] 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.
- [X] Other: 3Q25 Groundwater Monitoring Summary

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE Facility ID: 469293 API #: County Name: WELD
Facility Name: SPILL/RELEASE POINT Latitude: 40.267356 Longitude: -104.735617
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESE Sec: 35 Twp: 4N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use: Agriculture farmland and an irrigation ditch to the north of the Site.

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? No

Other Potential Receptors within 1/4 mile

Groundwater is located between approximately 8 and 20 feet below ground surface across the Site. A water supply canal named the Platte Valley Canal owned by the Farmer's Reservoir & Irrigation Company (FRICO) is located to the north of the Gas Plant.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	See Attached Figures	Monitoring Wells and Lab Analysis
Yes	SOILS	175' x 200'	Soil sample 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.

DCP Operating Company (DCP) discovered the release on November 17, 2019, when Operations noticed a drain valve on a condensate stabilizer re-boiler was leaking by the produced water sump and overfilling the sump with a mixture of condensate and produced water. Operations immediately actuated the valve, stopping the release. A vac truck was quickly deployed to remove the liquids within the sump and on the ground. Due to consistent freezing temperatures after the release, further Site investigation and remediation activities were delayed due to a thick frost layer and an initial Site investigation was completed in May 2020 to assist in defining the extent of the impacted soils area. Initial actions and completed remedial measures were submitted and approved by the Energy and Carbon Management Commission (ECMC) in the Form 19-Initial (#402242020) and Form 19-Supplemental (#402283236). The Initial Form 27 Site Investigation and Remediation Work Plan (#402282471), approved by the ECMC issued Spill tracking facility ID #469293 and Remediation Project #14898 for the Site. Information on remedial activities and ongoing investigations completed onsite have previously been provided to the ECMC in Form 27 Supplemental reports, most recently with report #404278545. The details of the groundwater monitoring activities completed in the third quarter 2025 (3Q25) are provided herein which includes a recertified secured laboratory analytical report that was originally provided with the 3Q25 Form 27-S #404379816 but was denied on 10/13/2025. 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):

Soil sampling activities and results that have been performed at the Site were provided in previously submitted Form 27-S reports. Soil sampling and analysis was not performed during the 3Q25 reporting period and additional investigative soil sampling is not anticipated to be completed at this time.

Proposed Groundwater Sampling

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

DCP will continue quarterly groundwater monitoring and reporting at the Site.

Proposed Surface Water Sampling

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

The FRICO-owned Platte Valley Canal is approximately 80 feet north of the northeast corner of the Mewbourn Gas Plant facility boundary. Surface water in the canal is intermittent and is only present when FRICO is running water to fill a downstream reservoir. The most recent surface water sample (SW-01) was collected from the canal on March 19th, 2021. The sample was collected from flowing water in the bottom of the canal, but FRICO was not running water at full volume at that time. DCP collected the surface water sample to determine if surrounding groundwater was infiltrating and impacting the bottom of the canal. Based on the surface water data and the January and March 2021 meetings with FRICO personnel, the canal likely acts as a losing stream when water is flowing through it and is not impacted by groundwater. DCP does not anticipate further sampling of the surface water within the canal at this time.

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 exceeeding 915-1: 0

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet): 95000

NA / ND

NA — Highest concentration of TPH (mg/kg):

NA — Highest concentration of SAR:

BTEX > 915-1: No

Vertical Extent > 915-1 (in feet): 24

Groundwater

Number of groundwater samples collected: 21

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet): 12

Number of groundwater monitoring wells installed: 21

Number of groundwater samples exceeding 915-1: 7

-- — Highest concentration of Benzene (µg/l): 34000

ND — Highest concentration of Toluene (µg/l):

-- — Highest concentration of Ethylbenzene (µg/l): 1320

-- — Highest concentration of Xylene (µg/l): 19300

NA — Highest concentration of Methane (mg/l):

Surface Water

0 Number of surface water samples collected

0 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): 0

Volume of liquid waste (barrels): 2

☐ 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.

During the excavation activities in December 2020, approximately 2,000 cubic yards (yd3) of material were removed for disposal. Soil samples from the southeast, southwest, and northwest sidewalls of the excavation indicate that impacted shallow soil above 16 feet below ground surface (ft bgs) has been removed. Based on the samples collected from the southeast wall, additional impacted material remains below 16 ft bgs. However, due to the proximity to facility infrastructure, any remaining source material at that location will likely require in-situ remediation. Once a point to the south was reached that further excavation could no longer be performed safely, the southern portion was backfilled, and excavation efforts were focused to the north on DCP property. Excavation activities were suspended due to proximity to facility infrastructure and the FRICO canal.

During 1Q22, the produced water sumps that were the source of the original release at the Site were removed in accordance with the approved Form 27-S work plan document #402886141. During removal, impacts to soil were discovered based on visual observation, field screening, and laboratory confirmation samples, and Form 19 reports #402927836, #402934259, and #402960891 were submitted and approved. Form 19-S document #402960891 was approved by ECMC for closure of spill/release ID #481427 to continue investigation and remediation under the current remediation number (#14898) for this Site.

Approximately 75 gallons of groundwater were produced from purging activities during the 3Q25 monitoring event. Purged groundwater was disposed of at an offsite NGL facility.

REMEDIATION 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.

Remediation activities including initial spill response, excavation, investigation activities, and AS/SVE remediation system design that were performed at the Site through the fourth quarter 2024 have been provided previously in approved Form 19 and Form 27 reports.

In accordance with the approved Form 27-S document #403747626, DCP initiated AS/SVE system installation activities beginning with remediation well drilling and completion. Between May 20, 2024, and September 3, 2024, 23 SVE wells and 14 AS wells were installed per the remediation work plan that was previously submitted and approved. Additional system installation activities were completed in November 2024 and January 2025 and a figure showing the AS/SVE system layout was provided as an attachment in 1Q25 Form 27-S report #404159729. DCP submitted the final well completion reports to the State Engineers Office Division of Water Resources (CDWR). An Air Pollutant Emission Notice (APEN) has been submitted to the CDPHE and once approved, the AS/SVE system will be delivered to the Site and placed in the area shown on the figure. Following completion of the system install activities, DCP plans to perform AS/SVE system startup and operation, anticipated sometime in 2025. Detailed as-builts of the final remediation system installation and startup plan will be provided in subsequent Form 27-S reports.

Soil Remediation Summary

☐ **In Situ**

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

☒ **Ex Situ**

- Yes Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) 2000
  - 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

- No Bioremediation (or enhanced bioremediation)
- No Chemical oxidation
- No Air sparge / Soil vapor extraction
- No Natural Attenuation
- No 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.

A total of 21 monitoring wells are presently installed at the Site, and groundwater monitoring activities were conducted across September 15-16, 2025, at the well locations illustrated on Figure 2. During the 3Q25 monitoring event, all 21 monitoring wells were gauged and sampled. Water levels were measured to evaluate the hydraulic characteristics and fluctuations at the Site. The depth to groundwater measurements and calculated elevations are presented on Table 1, a groundwater elevation contour map is provided as Figure 3, and the groundwater analytical data are presented on Table 2 and Figure 4. The laboratory report for the 3Q25 groundwater event is provided as a separate attachment. Groundwater samples were submitted to Pace Analytical Laboratory for analysis of the parameters listed in the approved SAP (Table 4), using USEPA Methods. Analytical results for groundwater were reported below applicable ECMC Table 915-1 standards and/or laboratory detection limits at 14 of the 21 well locations that were sampled. Groundwater monitoring will continue on a quarterly basis.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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: [X] Groundwater Monitoring [ ] Land Treatment Progress Report [ ] O&M Report

[ ] Other

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.

DCP has sufficient insurance to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. DCP currently has $5,000,000 in general liability insurance. The cost provided below for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. DCP makes no representation or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: $ 500000

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:

Approximately 2,000 cubic yards of soil was transported to the Waste Management Buffalo Ridge Landfill in Keenesburg, CO for disposal. Approximately 75 gallons of groundwater was produced from purging activities during the 3Q25 monitoring event. Purged groundwater was disposed of at an offsite NGL facility.

Volume of E&P Waste (solid) in cubic yards 2000

E&P waste (solid) description Petroleum Hydrocarbon Impacted Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management Buffalo Ridge Landfill

Volume of E&P Waste (liquid) in barrels 2

E&P waste (liquid) description Purged Groundwater

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Mewbourn Gas Plant Produced Water Tank

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 excavated area at the northern boundary of the facility has been backfilled with clean structural fill, and the facility perimeter wall and fence that were removed to allow for excavation have been reconstructed. Following implementation of remedial actions at the Site, landscaping and grading on the outside of the facility will be completed to match pre-remediation conditions.

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. 11/17/2019

Actual Spill or Release date, or date of discovery. 11/17/2019

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/18/2019

Proposed site investigation commencement. 05/13/2020

Proposed completion of site investigation. 12/31/2027

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/01/2020

Proposed date of completion of Remediation. 12/31/2027

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 27-S is being submitted to present the groundwater monitoring activities conducted during the 3Q25. Ongoing groundwater monitoring will continue on a quarterly basis until a period of four consecutive quarterly monitoring events have demonstrated that groundwater impacts are below ECMC Table 915-1 standards. The results of the quarterly groundwater monitoring events will be presented to the ECMC via quarterly Form 27-S reports.

Additionally, in accordance with approved Form 27-S documents #403747626 and #403863824, DCP has completed the installation and construction of an AS/SVE remediation system based on the work plan provided to ECMC. A figure showing the system layout was provided with 1Q25 Form 27-S report #404159729 and the APEN has been submitted to the CDPHE and once approved, the AS/SVE system will be delivered to the Site and placed in the area shown on the figure. Following completion of the system install activities, DCP plans to perform AS/SVE system startup and operation, anticipated sometime in 2025 or early 2026. Detailed as-builts of the final remediation system installation and startup plan will be provided in subsequent Form 27-S reports.

In the 1Q25 Form 27-S report #404159729, DCP requested approval from the ECMC to perform initial startup of the remediation system upon the arrival of the system and completion of final installation activities, in accordance with the workplan. Further details and as-builts of the final remediation system and startup activities will be provided in subsequent Form 27-S reports when work is complete.

The Pace Analytical Laboratory groundwater analytical report # L1898968 associated with the denied 3Q25 Form 27-S report #404379816 is provided as a separate attachment. The laboratory report was originally issued on 8/22/2025 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: stephen.weathers@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: 14898

COA Type	Description
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.

Att Doc Num	Name
404417358	ANALYTICAL DATA SUMMARY TABLE(S)
404417359	SITE MAP
404417361	LABORATORY ANALYTICAL REPORT

Total Attach: 3 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)