

**FORM
INSP**

Rev
X/20

**State of Colorado
Energy and Carbon Management Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

10/30/2025

Submitted Date:

11/04/2025

Document Number:

718300095

FIELD INSPECTION FORM

Loc ID: 428148 Inspector Name: Anderson, Laurel On-Site Inspection: 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

ECMC Operator Number: 69175
Name of Operator: PDC ENERGY INC
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202

Findings:

- 10 Number of Comments
- 5 Number of Corrective Actions
- Corrective Action Response Requested

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
Graber, Nikki		nikki.graber@state.co.us	
Peterson, Tom		tom.peterson@state.co.us	
Mitchem, Katelyn		katelyn.mitchem@state.co.us	
Peterson, Dan		danpeterson@chevron.com	
Rollins, Grace		grace.rollins@state.co.us	
,		rbucogccinspectionreports@chevron.onmicrosoft.com	All Inspections
Brown, Kari		kari.oakman@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
428150	WELL	TA	06/05/2025	OW	123-35252	Gaddis 36M-443	TA
428158	WELL	TA	06/05/2025	OW	123-35259	GADDIS 36J-303	TA
428405	WELL	PR	08/01/2025	OW	123-35352	Gaddis 36E-323	PR
431697	WELL	PR	08/01/2025	OW	123-36740	Gaddis 36J-223	PR
431706	WELL	TA	06/05/2025	OW	123-36746	Gaddis 36J-243	TA
431871	WELL	SI	07/01/2025	OW	123-36832	Gaddis 36E-403	SI
472362	OFF-LOCATION FLOWLINE	AC	02/27/2020		-	Wellhead Line 36J-HZ Pad	EI
491990	SPILL OR RELEASE	AC	10/29/2025		-	Gaddis 36J-HZ	EI
491991	SPILL OR RELEASE	AC	10/29/2025		-	Gaddis 36J-HZ	EI
491993	SPILL OR RELEASE	AC	10/29/2025		-	Gaddis 36J-HZ AST	EI

General Comment:

This is an ECMC Environmental Field Inspection to determine progress on Spill IDs: 491766, 491784, 491657, 491993, 491990 and 491991. Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Spill Name: GADDIS 36M-443

Spill ID: 491766

Hydrocarbon odor and hydrocarbon staining during the decommissioning activities at the GADDIS 36M-443, wellhead, samples: WH01 & WC-1 located at the wellhead in the same excavation.

Reported Date of Discovery: 10/9/2025

Lat/Long 40.276550 / -104.956074

19i/s Doc #404385886

Spill Name: GADDIS 36J-223

Spill ID: 491784

Hydrocarbon odor and hydrocarbon staining during the decommissioning activities at the GADDIS 36J-223, wellhead, samples: WH01, FL01-R, and WC-1 located from the wellhead and flowline riser in the same excavation.

Reported Date of Discovery: 10/9/2025

Lat/Long: 40.276550 / -104.956183

19i/s Doc #404386417

Spill Name: GADDIS 36J-243

Spill ID: 491657

Hydrocarbon odor and hydrocarbon staining during the decommissioning at the GADDIS 36J-243, wellhead, samples: WH01, WH01-N, and WC-1, all located in the same excavation at the wellhead.

Reported Date of Discovery: 10/1/2025

Lat/Long: 40.276536 / -104.956395

19i/s Doc #404377255

Spill Name: Gaddis 36J-HZ AST

Spill ID: 491993

Hydrocarbon odor and hydrocarbon staining during the decommissioning activities at the Gaddis 36J-HZ, tank battery, samples: AST14, AST15, AST17, AST18, AST21, AST22, AST23, AST24, AST25, located at the former aboveground storage tanks and due to close proximity are all considered one release.

Reported Date of Discovery: 10/23/2025

Lat/Long: 40.277004 / -104.955311

19i/s Doc #404407472

Spill Name: Gaddis 36J-HZ

Spill ID: 491990

Hydrocarbon odor and hydrocarbon staining during the decommissioning at the Gaddis 36J-HZ, tank battery, samples: PWV01-FS, PWV01-SS05, PWV02-FS, PWV02-SS04 located at the produced water vessels and are all considered one release.

Reported Date of Discovery: 10/22/2025

Lat/Long: 40.277114 / -104.955424

19i/s Doc #404402771

Spill Name: Gaddis 36J-HZ

Spill ID: 491991

Hydrocarbon odor and hydrocarbon staining during the decommissioning at the Gaddis 36J-HZ, tank battery, samples: SEP01-DL, SEP02-DL, SEP05-DL located at the separator dumplines and due to close proximity are all considered one release.

Reported Date of Discovery: 10/22/2025

Lat/Long: 40.277118 / -104.955950

19i/s Doc #404402829

Location Name: Gaddis/36J-HZ Pad

Location ID: 428148

Location is adjacent to cropland and is located less than 0.25 miles from mapped wetlands and surface waters (Farmers Extension Ditch, Davis Reservoir),

See comments for more information.

Location

Overall Good:

Signs/Marker:			
Type	BATTERY		
Comment:	Signage with emergency contact number is present at the location entrance (Photo 1).		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action: Date: _____

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	Unused equipment (ASTs, flowlines, other ancillary equipment, cattle fencing, etc.) are being stored on location and in roll-off dumpsters on location. See Photos 2, 11-12, 18-21.		
Corrective Action:	Comply with Rule 606.a. and ECMC Rule 1004.a which states: "Upon the plugging and abandonment of a well, all pits, mouse and rat holes and cellars shall be backfilled. All debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well."	Date:	12/16/2025
Type	WEEDS		
Comment:	Weeds observed around the perimeter of the location. See Photos 1-2, 18 & 20-22.		
Corrective Action:	Comply with Rule 606.c.	Date:	11/18/2025
Type	TRASH		
Comment:	Trash/debris were observed throughout the location. See Photos 2, 11, 13 & 17-20.		
Corrective Action:	Comply with Rule 606.d.	Date:	11/18/2025
Type	OTHER		
Comment:	Stained soil was observed throughout the location in multiple areas (near: roll-off dumpsters, the former tank battery and wellheads). See Photos 13-16 & 19-22.		
Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. and comply with ECMC Rule 1002.f.(2)D. Self-inspection, maintenance, and good housekeeping procedures. These procedures shall include measures for maintaining clean, orderly operations and facilities. Note: For any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.	Date:	11/04/2025

Overall Good:

Spills:			
Type	Area	Volume	

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities				
Facility ID: <u>428150</u>	Type: <u>WELL</u>	API Number: <u>123-35252</u>	Status: <u>TA</u>	Insp. Status: <u>TA</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>428158</u>	Type: <u>WELL</u>	API Number: <u>123-35259</u>	Status: <u>TA</u>	Insp. Status: <u>TA</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>428405</u>	Type: <u>WELL</u>	API Number: <u>123-35352</u>	Status: <u>PR</u>	Insp. Status: <u>PR</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>431697</u>	Type: <u>WELL</u>	API Number: <u>123-36740</u>	Status: <u>PR</u>	Insp. Status: <u>PR</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>431706</u>	Type: <u>WELL</u>	API Number: <u>123-36746</u>	Status: <u>TA</u>	Insp. Status: <u>TA</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>431871</u>	Type: <u>WELL</u>	API Number: <u>123-36832</u>	Status: <u>SI</u>	Insp. Status: <u>SI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>472362</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>491990</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>491991</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>491993</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment:

Corrective Action: Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)	
Oily Soil					
Comment	The excavations at the multiple historic releases reported on location appear to have been backfilled and the surfaces regraded/driven over. No soil stockpiles were observed on location Operator has not provided waste manifests to date. Stained soil exhibiting hydrocarbon odor was observed throughout the location in multiple areas (near: roll-off dumpsters, the former tank battery and wellheads - See Photos 13-16 & 19-22).				
Corrective Action	Operator shall manage waste in accordance with ECMC Rules and ECMC Rule 913.b. (5)B i-v Remediation Standards Operator Guidance. Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal. Additionally, Operator shall provide all tickets for material hauled on site for backfill. This documentation shall be included on the next Supplemental Form 19 or 27.			Date:	

Spill/Remediation:

Comment: Operator has opened six separate remediation projects for this multiwell pad - ECMC has contacted the Operator and requested they submit a Form 27 to consolidate the existing remediation projects into a singular, comprehensive and cohesive Remediation Project to include all six wells, their respective flowlines and relevant Spill IDs.

Corrective Action: Date: _____

Emission Control Burner (ECB): _____

Comment:

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

ECMC Comments

Comment	User	Date
<p>Current site status:</p> <ul style="list-style-type: none"> -Signage with emergency contact number is present at the location entrance (Photo 1). -Two 3rd party meter sheds remain on location (Photos 1, 3, 17-18 & 22) -The tank battery has been decommissioned. -The excavation associated with Spill ID 491990 and the removal of the produced water vessels where soil samples: PWV01-FS@4', PWV01-SS05@3', PWV02-FS@4' and PWV02-SS04@3' were collected and documented as attachment Doc #404402800 with Form 19i/s Doc #404402771 was not observed during ECMC's inspection and appears to have been backfilled to grade. See Photos 4 & 21. -The excavation associated with Spill ID 491991 and soil samples (SEP05-DL@3', SEP02-DL@3' and SEP01-DL@3') that were collected at the separator dumplines and documented in photo documentation attached to Form 19i/s Doc #404402829 were not observed during ECMC's inspection and appear to have been backfilled to grade. See Photos 3 & 22. -The surface in and around the former tank battery appears to have been reworked/driven over by equipment, including where soil samples associated with Spill ID 491993 were collected (Soil samples with visible staining/hydrocarbon odor collected at AST14, AST15, AST17, AST18, AST21, AST22, AST23, AST24 and AST25 as documented in attachment Doc #404407502 on Form 19i/s Doc #404407472). See Photos 4 & 21. -The excavation and soil stockpile associated with decommissioning of the GADDIS 36M-443 wellhead and Spill ID 491766 where soil samples WH01 & WC-1 were collected and documented in attachment Doc #404385898 with Form 19i/s Doc #404385886 were not observed during ECMC's inspection. The excavation appears to have been backfilled to grade. See Photo 5. -The excavation and soil stockpile associated with decommissioning of the GADDIS 36J-223 wellhead and Spill ID 491784 where soil samples WH01, FL01-R, and WC-1 were collected from the wellhead and flowline riser in the same excavation and documented in attachment Doc #404387288 with Form 19i/s Doc #404386417 were not observed during ECMC's inspection. The excavation appears to have been backfilled to grade. See Photos 6 & 17. -The excavation and soil stockpile associated with decommissioning of the GADDIS 36J-243 wellhead and Spill ID 491657 where soil samples WH01, WH01-N, and WC-1 were collected from the wellhead in the same excavation and documented in attachment Doc #404377276 with Form 19i/s Doc #404377255 were not observed during ECMC's inspection. The excavation appears to have been backfilled to grade. See Photos 8 & 13-17, 19. -Weeds observed around the perimeter of the location. See Photos 1-2, 18 & 20-22. -Stained soil was observed throughout the location in multiple areas (near: roll-off dumpsters, the former tank battery and wellheads). See Photos 13-16 & 19-22. -Trash/debris were observed throughout the location. See Photos 2, 11, 13 & 17-20. -Unused equipment (ASTs, flowlines, other ancillary equipment, cattle fencing, etc.) are being stored on location and in roll-off dumpsters on location. See Photos 2, 11-12, 18-21. <p>See attached corrective actions.</p> <p>Date of Inspection: 10/30/2025 Weather: Clear, slight breeze <5mph, 48°F PPE: Level D & FR Clothing</p>	andersoln	11/04/2025

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
404423561	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7317365
718300098	2025_1030_Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7317362