FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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Document Number: 404383729
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 INFORMATON

Name of Operator: PDC ENERGY INC Operator No: 69175
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Lauren Hoff Email: rbueuf27@chevron.com

Phone Numbers
Phone: (970) 304-5000
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33091 Initial Form 27 Document #: 403603837

PURPOSE INFORMATION

- [ ] Rule 913.c.(1): Pit or Cuttings Trench closure.
- [X] 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.
- [X] 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: LOCATION Facility ID: 430790 API #: County Name: WELD
Facility Name: Campbell JF PAD 17-41D Latitude: 40.141808 Longitude: -104.683639
** correct Lat/Long if needed: Latitude: 40.142160 Longitude: -104.683468
QtrQtr: SWNE Sec: 17 Twp: 2N Range: 65W Meridian: 6 Sensitive Area? No

Facility Type: WELL Facility ID: API #: 123-36324 County Name: WELD
Facility Name: Campbell JF 17-41D Latitude: 40.141810 Longitude: -104.683537
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWNE Sec: 17 Twp: 2N Range: 65W Meridian: 6 Sensitive Area? No

Facility Type: WELL Facility ID: API #: 123-37649 County Name: WELD

Facility Name: Campbell JF 17-6D-1 Latitude: 40.141811 Longitude: -104.683883

** correct Lat/Long if needed: Latitude: Longitude:

QtrQtr: SWNE Sec: 17 Twp: 2N Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 491381 API #: County Name: WELD

Facility Name: Campbell JF PAD 17-41D Latitude: 40.142183 Longitude: -104.683867

** correct Lat/Long if needed: Latitude: Longitude:

QtrQtr: SWNE Sec: 17 Twp: 2N Range: 65W Meridian: 6 Sensitive Area? Yes

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? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Closest Domestic Well within quarter mile – 1,005' SE
Additional Domestic Wells – None
Nearest Surface Water – None
Nearest Occupied Building – None
Additional Occupied Buildings – None

No other potential receptors are located within ¼ mile of the Site
Above distances are approximations

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] 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
UNDETERMINED	GROUNDWATER	NA	Lab Analysis and Field Screening, if encountered
Yes	SOILS	Refer to Tables and 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, a site investigation was conducted on 09/09/2025 abandonment activities at the Campbell JF production facility and removal of associated flowlines. Campbell JF 17-41D (API #05-123-36324) flowline and the Campbell JF 17-6D-1 (API #05-123-37649) flowline will be reported under this remediation number as FL01 and FL02, respectively. Both flowlines (FL01 and FL02) were fully removed from separator to wellhead. A site investigation was conducted on 10/22/2025 for wellhead cut and cap activities Campbell JF 17-41D wellhead.

Hydrocarbon staining and elevated PIDs were observed during decommissioning at sample location SEP03DL@5' and a release was reported (Form 19 Doc #404348902). The associated Spill/Release ID (#491381) is included under the Site Information section of this form.

The Campbell JF 17-13D, Campbell JF 17-6D, Campbell JF 17-7D, Campbell JF 17-8D, Campbell JF 17-9D wellhead and flowlines shown on the proposed sampling map attached to the IF27 (Document #403603837) were previously decommissioned between 2013 and 2020 and will be excluded from the sampling plan. The Campbell JF 17-6D-1 wellhead was previously cut and capped in 2021 and the wellhead sample will be excluded from the sampling plan. Additionally, no infrastructure was observed to the west of the produced water vessel and this sample location will be excluded from the sampling plan. Soil samples were not collected beneath the separator flowline risers of SEP02 and SEP03 and will be sampled during subsequent site investigation activities.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Grab confirmation soil samples were collected beneath the wellhead excavation (WH01@4'). Grab confirmation soil samples were collected from beneath the above ground storage tanks (AST01@0-6", AST02@0-6", AST03@0-6", AST04@0-6", and AST05@0-6"), at the risers for the flowlines (SEP01-FL@7' and SEP04-FL@7') and dumplines (SEP01-DL@5', SEP02-DL@5', SEP03-DL@5', and SEP04-DL@5') of the separators, at the base and north side of the produced water vessel (PWV01-B@5' and PWV01-N@2', respectively), along the two flowlines (FL01-01@5' and FL02-01@5'), and at the wellhead risers (FL01R-W@4' and FL02R-W@3'). Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation, grab groundwater samples will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1.

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):

Visual inspection of the facility infrastructure, wellhead, and flowline areas occurred during decommissioning activities. Field personnel field screened all disturbed areas using visual and olfactory senses. A detailed summary of facility, wellhead, and flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 18

Number of soil samples exceeeding 915-1: 6

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet): 600

NA / ND

-- Highest concentration of TPH (mg/kg): 8890

-- Highest concentration of SAR: 11.8

BTEX > 915-1: No

Vertical Extent > 915-1 (in feet): 5

Groundwater

Number of groundwater samples collected: 0

Was extent of groundwater contaminated delineated? Yes

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?

[X] Were background samples collected as part of this site investigation?

On 10/22/2025, three background soil samples were collected from one discrete location (BKG01) adjacent to the wellhead and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from a depth of 4 feet below ground surface (ft bgs). The maximum background concentrations for pH, EC, and SAR were observed to be 7.98, 6.0 mmhos/cm, and 11.0, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, chromium, and selenium were calculated to be 11.6 mg/kg, 216 mg/kg, 1.08 mg/kg, and 0.33 mg/kg, respectively. All EC concentrations observed during decommissioning were below background levels. All arsenic, chromium and selenium concentrations observed during decommissioning were below 1.25x the maximum background levels.

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

Volume of solid waste (cubic yards):

Volume of liquid waste (barrels):

[X] Is further site investigation required?

A supplemental site investigation (SSI) was completed on 12/01/2025 to vertically and horizontally delineate the organic compound exceedances observed at sample locations SEP02-DL@5' and SEP03-DL@5'. During the SSI, soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Laboratory analytical results for the SSI performed on 12/01/2025 are pending. Following the receipt of analytical reports, results will be summarized and provided. An executed chain-of-custody, sample receipt summary, and soil sample location map are attached to this form.

Further site investigation activities will be conducted to collect analytical soil samples beneath the separator flowline risers of SEP02 and SEP03 as depicted on the proposed sampling map attached to the IF27 (Document #403603837). Concurrently with the SSI, additional background samples will be collected to determine if elevated barium, pH, and SAR observed during decommissioning are attributed to native soil conditions at the site. The site investigation will be completed in accordance with the proposed sampling plan and sample locations are shown on the attached proposed site investigation plan.

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.

Refer to the Remediation Summary section below.

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.

Facility decommissioning activities occurred at the above referenced facility pad and associated flowline locations on 09/09/2025. Wellhead cut and cap activities were conducted on 10/22/2025 for wellhead cut and cap activities at the Campbell JF 17-41D wellhead. Hydrocarbon staining and elevated PIDs were observed during August 2025 decommissioning at sample location SEP03-DL@5' and a release was reported (Form 19 Doc #404348902). Analytical results indicated that soil samples SEP02-DL@5' and SEP03-DL@5' exhibited organic compound concentrations in exceedance of the applicable regulatory screening levels. October 2025 Wellhead decommissioning results indicated that organic compound concentrations were in compliance with the applicable regulatory screening levels.

An SSI was conducted on 12/01/2025 vertically and horizontally delineate organic impacts encountered at SEP02-DL@5' and SEP03-DL@5' during decommissioning. Soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Groundwater was not encountered during this assessment. Laboratory analytical results for the SSI performed on 12/01/2025 are pending. Following the receipt of analytical reports, results will be summarized and provided. An executed chain-of-custody, sample receipt summary, and soil sample location map are attached to this form.

Further site investigation activities will be conducted to collect analytical soil samples beneath the separator flowline risers of SEP02 and SEP03 as depicted on the proposed sampling map attached to the IF27 (Document #403603837).

Soil Remediation Summary

☐ **In Situ**

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

☐ **Ex Situ**

- _____ 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.

Groundwater was not encountered during site investigation activities to date.

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

[X] Other Decommissioning Sample Summary

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.

- Further soil investigation/delineation is required
- Source removal activities are required

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: $ 65000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

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

E&P waste (solid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

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.

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?

[X] 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. 09/09/2025

Proposed date of completion of Reclamation. 06/30/2028

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. 10/16/2023

Actual Spill or Release date, or date of discovery. 09/09/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/09/2025

Proposed site investigation commencement. 12/01/2025

Proposed completion of site investigation. 12/04/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/04/2025

Proposed date of completion of Remediation. 06/30/2026

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.

[X] Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The implementation schedule has been changed due to the decommissioning of the Campbell JF Pad 17-41D facility. Supplemental site investigation activities occurred on 12/01/2025. Laboratory analytical results for the SSI performed on 12/01/2025 are pending. Following the receipt of analytical reports, results will be summarized and provided. Further site investigation activities will be scheduled following receipt of analytical results to determine if additional organic delineation is required.

OPERATOR COMMENT

This Form 27 is being submitted to include the decommissioning results, historical reportable release discovered, document supplemental site investigation (SSI) activities completed, and proposed additional SSI activities at the Campbell JF Pad 17-41D location (REM # 33091).

In response to the Corrective Action Responses Requested on the ECMC Field Inspection Form submitted on 11/03/2025 (ECMC Document # 718300093), no waste manifests for the removal of the impacted soil are attached because the material was placed back in the original hole by crews. Additionally, this Supplemental Form 27 was submitted off of the understanding that reporting would be required 90 days post decommissioning activities, with a quarterly reporting schedule following this submittal. PDC will comply with this schedule continuing forward on this project.

Facility decommissioning activities occurred at the above referenced facility pad and associated flowline locations on 09/09/2025. Wellhead cut and cap activities were conducted on 10/22/2025 for the Campbell JF 17-41D wellhead. The Campbell JF 17-13D, Campbell JF 17-6D, Campbell JF 17-7D, Campbell JF 17-8D, Campbell JF 17-9D wellhead and flowlines shown on the proposed sampling map attached to the IF27 (Document # 403603837) were previously decommissioned between 2013 and 2020 and will be excluded from the sampling plan. The Campbell JF 17-6D-1 wellhead was previously cut and capped in 2021 and the wellhead sample will be excluded from the sampling plan. Additionally, no infrastructure was observed to the west of the produced water vessel and this sample location will be excluded from the sampling plan. Soil samples were not collected beneath the separator flowline risers of SEP02 and SEP03, and will be sampled during subsequent site investigation activities. The Campbell JF 17-41D (API #05-123-36324) flowline and the Campbell JF 17-6D-1 (API #05-123-37649) flowline will be reported under this remediation number as FL01 and FL02, respectively. Both flowlines (FL01 and FL02) were fully removed from separator to wellhead.

Hydrocarbon staining and elevated PIDs were observed during tank decommissioning at sample location SEP03-DL@5' and a release was reported (Form 19 Doc #404348902). The associated Spill/Release ID (#491381) is included under the Site Information section of this form. Analytical results indicated that soil samples SEP02-DL@5' and SEP03-DL@5' exhibited organic compound concentrations in exceedance of the applicable regulatory screening levels. Wellhead decommissioning results indicated that organic compound concentrations were in compliance with the applicable regulatory screening levels.

An SSI was completed on 12/01/2025 to vertically and horizontally delineate the organic compound exceedances observed at sample locations SEP02-DL@5' and SEP03-DL@5'. During the SSI, soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Laboratory analytical results for the SSI performed on 12/01/2025 are pending. Following the receipt of analytical reports, results will be summarized and provided. An executed chain-of-custody, sample receipt summary, and soil sample location map are attached to this form. Groundwater has not been encountered during site investigation activities to date.

Further site investigation activities will be conducted to collect analytical soil samples beneath the separator flowline risers of SEP02 and SEP03 as depicted on the proposed sampling map attached to the IF27 (Document #403603837). Concurrently with the SSI, additional background samples will be collected to determine if elevated barium, pH, and SAR observed during decommissioning are attributed to native soil conditions at the site.

Pursuant to Rule 913.e, quarterly reporting will continue until the closure criteria for the remediation area are achieved. The results of the SSI 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: Michael Liston Title: Environmental Consultant

Submit Date: Email: Tas-chevron-3@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: Date:

Remediation Project Number: 33091

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
404384315	LABORATORY ANALYTICAL REPORT
404461233	SITE INVESTIGATION REPORT
404461234	LABORATORY ANALYTICAL REPORT
404461235	OTHER
404461741	SITE INVESTIGATION REPORT
404461774	SITE INVESTIGATION PLAN
404461783	SOIL SAMPLE LOCATION MAP

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)