

State of Colorado  
Energy & Carbon Management Commission

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



Document Number:  
404390485  
Receive Date:  
12/09/2025

Report taken by:  
Rick Allison

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	<b>Phone Numbers</b>
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 304-5000
City: DENVER State: CO Zip: 80202		Mobile: ( )
Contact Person: Dan Peterson	Email: RBUEUF27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38155 Initial Form 27 Document #: 403958073

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

Yes Multiple Facilities

Facility Type: LOCATION	Facility ID: 448368	API #: _____	County Name: WELD
Facility Name: Orr State 40-36 Pad	Latitude: 40.442473	Longitude: -104.834459	
** correct Lat/Long if needed: Latitude: 40.443191		Longitude: -104.833118	
QtrQtr: NESE	Sec: 36	Twp: 6N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 488800	API #: _____	County Name: WELD
Facility Name: Former Orr State 40-36 Pad	Latitude: 40.443179	Longitude: -104.833105	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 36	Twp: 6N	Range: 67W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Grassland

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**

Aquatic Native Species Conservation Waters  
Riverine 0.01/0.02mi S, 0.7mi N  
Riparian Forested Shrub 0.09mi E, 0.06/0.09/0.1/0.12mi N, 0.24mi W  
Freshwater Emergent Wetlands 0.04mi E, 0.07/0.11mi NE, 0.25mi W  
Lake 0.07mi E  
Freshwater Pond 0.15mi N

**DENIED**

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input checked="" type="checkbox"/> Oil            | <input type="checkbox"/> Tank Bottoms                |  |
| <input checked="" type="checkbox"/> Condensate     | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> Other (as described by EPA) |  |

## 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.

A site investigation was conducted pursuant to ECMC Rule 911 at the Orr State 36 SEC Facility/Orr State 40-36 Pad around the area of the Partially Buried Vessel being removed.

## 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 ):

Grab confirmation soil sample were collected from the partially buried vessel excavation. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

### Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation, a grab groundwater sample 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 at the partially buried vessel area occurred during decommissioning activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>        6        </u>	-- Highest concentration of TPH (mg/kg) <u>        1449        </u>
Number of soil samples exceeding 915-1 <u>        6        </u>	-- Highest concentration of SAR <u>        1.29        </u>

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

BTEX > 915-1 No

Approximate areal extent (square feet) 600

Vertical Extent > 915-1 (in feet) 9

**Groundwater**

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? Yes

Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) \_\_\_\_\_

Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed \_\_\_\_\_

Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 \_\_\_\_\_

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) \_\_\_\_\_

Volume of liquid waste (barrels) \_\_\_\_\_

Is further site investigation required?

A supplemental site investigation (SSI) will be completed to collect background samples (5+). Samples collected will be analyzed for metals and inorganics in soil per ECMC Table 915-1 to determine if the elevated arsenic, barium, and lead exceedances observed in the remedial excavation extent are attributed to native soil conditions at the site. Background samples will be collected in accordance with the approved site investigation plan attached to Doc #404178155.

**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.

All soil impacted with organic compounds above ECMC Table 915-1 protection of groundwater soil screening levels (GSSLs) were successfully removed through the remedial excavation completed on January 10, 2025 and January 14, 2025. Based on an evaluation of confirmation soil sampling results, elevated arsenic, barium, and lead are present in the sidewalls and base of the excavation above ECMC Table 915-1 GSSLs.

**REMEDIAL ACTION 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.

A supplemental site investigation (SSI) will be completed to collect background samples (5+). Samples collected will be analyzed for metals and inorganics in soil per ECMC Table 915-1 to determine if the elevated arsenic, barium, and lead exceedances observed in the remedial excavation extent are attributed to native soil conditions at the site. Background samples will be collected in accordance with the approved site investigation plan attached to Doc #404178155.

**Soil Remediation Summary**

In Situ

Ex Situ

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

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

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

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) 30

\_\_\_\_\_ 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

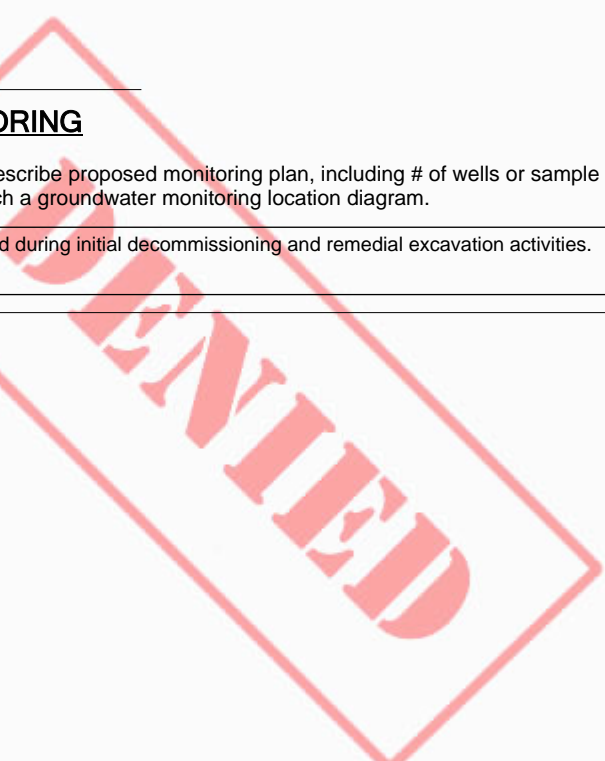
\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ 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 initial decommissioning and remedial excavation activities.



# 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 Timeline Update

## 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

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: \$ 15000

## 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 30

E&P waste (solid) description Hydrocarbon Impacted Soil

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

Non-ECMC Disposal Facility: Tower Landfill

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? No

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? Yes

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 in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes

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. 12/17/2024

Proposed date of completion of Reclamation. 06/30/2027

## 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. 12/17/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/17/2024

Proposed site investigation commencement. 01/14/2025

Proposed completion of site investigation. 03/31/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/31/2026

Proposed date of completion of Remediation. 09/30/2026

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.

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 completion of the January 2025 remedial excavation activities at the Orr State 40-26 Pad partially buried vault (PBV) and necessity for additional supplemental site investigation activities adjacent to the tank battery. The proposed supplemental site investigation (SSI) is tentatively scheduled for completion by the end of 1Q 2026.

## OPERATOR COMMENT

This form has been submitted to provide a 4Q 2025 quarterly update for the former Orr State 40-36 pad (REM #38155). No work has been completed since the previous quarterly update. Remediation and site investigation is now under the direction of Montrose Environmental (Montrose). Landman access has been requested and is awaiting review.

A supplemental site investigation (SSI) will be completed to collect background samples (5+). Samples collected will be analyzed for metals and inorganics in soil per ECMC Table 915-1 to determine if the elevated arsenic, barium, and lead exceedances observed in the remedial excavation extent are attributed to native soil conditions at the site. Background samples will be collected in accordance with the approved site investigation plan attached to Doc #404178155.

In response to the ECMC comment dated July 27, 2025 (Denied Doc. #404295121), the implementation schedule has been updated to allow for the completion of the initial background sampling to compare native conditions at the site. The current forms implementation schedule reflects the time required for additional investigation/remediation at the Orr State 40-36 pad.

Pursuant to Rule 913.e., Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation 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: Scott Williamson

Title: Environmental Consultant

Submit Date: 12/09/2025

Email: NortherncoloradoPM@montrose-env.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: 38155

### COA Type

### Description

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

Att Doc Num	Name
404390485	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

### General Comments

### User Group

### Comment

### Comment Date

User Group	Comment	Comment Date
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): 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 may request expedited review if necessary.</p> <p>Operator shall conduct work in compliance with approved workplans and the 900 Series Rules. Operator shall provide a replacement form documenting investigation and clean up of these impacts; if a form providing this information is in process no replacement Form is due. If Operator is requesting a schedule change under Rule 913.d.(2) Operator shall attach adequate justification for the request. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.</p>	12/10/2025

Total: 1 comment(s)