

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Alexander Ahmadian

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>PDC ENERGY INC</u>	Operator No: <u>69175</u>	Phone Numbers Phone: <u>(970) 304-5000</u> Mobile: <u>()</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33833 Initial Form 27 Document #: 403622799

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

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>431446</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Land JG Offsite Tank Battery 31-25D</u>	Latitude: <u>40.088647</u>	Longitude: <u>-104.602339</u>	
** correct Lat/Long if needed: Latitude: <u>40.088426</u>		Longitude: <u>-104.602473</u>	
QtrQtr: <u>Lot 2</u>	Sec: <u>31</u>	Twp: <u>2N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

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? Yes
Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Nearest Well: Domestic - 378' WSW; Surface Water: Irrigation Ditch - 112' W; Livestock: 1,073' E; FWS Wetlands: 844' NNE Freshwater Emergent Wetland (PEM1C); HPH Sensitive Wildlife Habitat: Rule 1202.d: Tank Battery Within Mule Deer Migration Corridor; Rule 1202.c: 383' NE Aquatic Native Species Conservation Area; 100-Year Floodplain 247' NE of Tank Battery.

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)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Laboratory analysis and field screening, if encountered
Yes	SOILS	Refer to tables and figures	Laboratory 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, this form serves as notification for the decommissioning and abandonment of the Land 31-13, 17, 19, 24, 36D production facility. The ground and sub-surfaces were visually inspected for hydrocarbon impacts during equipment decommissioning. In addition, on-site dump lines located between the separator and tank battery were removed by pulling from either end during decommissioning activities. Field observations and photo documentation were recorded in a field inspection form and is attached to ECMC Document No. 404015525.

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 samples were collected from the produced water vessel excavation, beneath the ground oil tanks, at the risers for the flowline and dumphline of the separator. In addition, the on-site dump lines located between the separator and tank battery were removed by pulling from either end. 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 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):

[Empty box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Visual inspection at the tank battery area occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses. Additionally, discrete soil samples were collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to ECMC Document No. 404015525.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 14
Number of soil samples exceeding 915-1 6
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 600

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 6.66
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
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?

On 9/10/2024, three background soil samples were collected at one discrete location (BKG01) near the tank battery in native material at depths ranging from 0.5 and 4.5 feet bgs and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron.

On 9/18/2024 and 12/18/2024, 21 background soil samples were collected near the tank battery (BKG02-BKG06) in native material under the Land JG 31 -13, 17, 19, 24, 36D flowlines project (REM# 33835). Samples were collected at depths ranging from 0.5 and 4.5 feet bgs and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron.

The maximum background concentration for pH was observed to be 8.63. The maximum background concentration with a 1.25x multiplier applied for arsenic, barium, and cadmium was calculated to be 7.66 mg/kg, 445 mg/kg, and 0.526 mg/kg respectively. Based on the analytical results, pH and cadmium remain in exceedance of ECMC standards and background concentrations on site.

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?

Based on decommissioning analytical results, a Supplemental Site Investigation (SSI) will be completed to vertically and horizontally delineate the pH exceedances observed at soil samples AST01@0-6", AST03@0-6", PWV02-S@2.5', and GL01@0-6 and the cadmium exceedances at soil samples SEP01-FL01@4.5' and SEP01-FL05@4.5'. All samples collected will be submitted for full Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and analyzed for metals and inorganics in soil per ECMC Table 915-1 to determine if pH and cadmium exceedances are attributed to native soil conditions at the site. Soil samples will be collected in accordance with approved site investigation plan Doc #404222365. Sample results will be reported in a subsequent Form 27.

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.

No impacted material caused by oil and gas operations was identified at this time.

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.

Based on decommissioning analytical results, a Supplemental Site Investigation (SSI) will be completed to vertically and horizontally delineate the pH exceedances observed at soil samples AST01@0-6", AST03@0-6", PWV02-S@2.5', and GL01@0-6 and the cadmium exceedances at soil samples SEP01-FL01@4.5' and SEP01-FL05@4.5'. All samples collected will be submitted for full Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and analyzed for metals and inorganics in soil per ECMC Table 915-1 to determine if pH and cadmium exceedances are attributed to native soil conditions at the site. Soil samples will be collected in accordance with approved site investigation plan Doc #404222365. Sample results will be reported in a subsequent Form 27.

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.

No groundwater was encountered during initial decommissioning activities.

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.

Following tank battery decommissioning activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with the ECMC 1000 series.

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. 09/09/2024

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

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. 11/02/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/09/2024

Proposed site investigation commencement. 06/30/2025

Proposed completion of site investigation. 12/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2025

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.

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 Land 31-13, 17, 19, 24, 36D Tank Battery and necessity supplemental site investigation activities adjacent to the tank battery. The proposed site investigation is tentatively scheduled to be completed by the end of 4Q 2025.

OPERATOR COMMENT

This form has been submitted to provide a 4Q 2025 update for the Land 31-13, 17, 19, 24, 36D tank battery location (REM #33833). No work has been completed since previous quarterly update. Access has been requested and is awaiting review.

Based on decommissioning analytical results, a Supplemental Site Investigation (SSI) will be completed to vertically and horizontally delineate the pH exceedances observed at soil samples AST01@0-6", AST03@0-6", PWV02-S@2.5', and GL01@0-6 and the cadmium exceedances at soil samples SEP01-FL01@4.5' and SEP01-FL05@4.5'. All samples collected will be submitted for full Table915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and analyzed for metals and inorganics in soil per ECMC Table 915-1 to determine if pH and cadmium exceedances are attributed to native soil conditions at the site. Soil samples will be collected in accordance with approved site investigation plan Doc #40422365.

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: 12/11/2025

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: 12/19/2025

Remediation Project Number: 33833

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

404422373	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

Environmental	ECMC has processed this form as an update without technical review; no data was attached thus approval of this form does not imply any agreement with comments on completion of site investigation or alteration of site plan. All ongoing/unaddressed comments/COAs from previous Forms remain applicable. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and may request expedited review if necessary.	12/19/2025
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Total: 1 comment(s)