

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Abdul Elnajdi

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	Phone Numbers Phone: (970) 304-5000 Mobile: ()
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Lauren Hoff	Email: RBUEUF27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38153 Initial Form 27 Document #: 403987230

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: WELL	Facility ID: _____	API #: 123-12736	County Name: WELD
Facility Name: KREPS 1	Latitude: 40.506030	Longitude: -104.590464	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 7	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Cropland
Is domestic water well within 1/4 mile? No 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

Within Mule Deer Severe Winter Range HPH
Freshwater Emergent Wetland 20ft S
Riverine 0.06mi E
Residential 0.14mi NW, 0.18mi W, 0.22mi E
Farm Structure 0.13/0.14/0.15mi N, 0.16/0.17mi NW, 0.2/0.22/0.23mi E
Apparent Pond 0.06mi SE, 0.16mi S

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
No	GROUNDWATER	Refer to tables and figures	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.

Pursuant to ECMC Rule 911 a site investigation will be conducted pertaining to the Kreps 1 wellhead cut and cap and flowline removal. Approximately 549' of flowline will be removed. The ECMC will be updated in a supplemental Form 27 if a portion of the flowline is abandoned-in-place due to field constraints. The wellhead will be cut and capped per ECMC rules. Additionally, soil samples will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway.

The decommissioning work described above has not been initiated. However, during peripheral new construction of an adjacent pipeline to the Kreps 1 flowline, subsurface impacts were observed on 10/31/2024. These impacts were reported as a spill to ECMC on Form 19 (Doc #403984180). Approximately 80 cubic yards of impacted soil were excavated and transported offsite for disposal. Additional excavation to completely remediate the site is anticipated to be completed by 2Q 2026.

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):

Upon wellhead and flowline decommissioning, a grab soil sample will be collected at the base of the excavation during field screening activities at the wellhead excavation. Additionally, soil samples will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Soil samples will be 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.

Proposed Groundwater Sampling

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

On November 14, 2024, groundwater was encountered in the remedial excavation at a depth of approximately 6 ft and a sample was collected and analyzed for Table 915-1 constituents. Analytical results were provided within the Form 27 (Doc. #404097466). If groundwater is encountered during site investigation activities, 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 of the wellhead and flowline areas will occur during abandonment activities. Field personnel will field screen all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 200

NA / ND

-- Highest concentration of TPH (mg/kg) 1750
-- Highest concentration of SAR 7.32
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 6
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____
ND Highest concentration of Toluene (µg/l) _____
ND Highest concentration of Ethylbenzene (µg/l) _____
ND Highest concentration of Xylene (µg/l) _____
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) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

The organic exceedances observed at sample location Waste Char (north excavation sidewall) during the initial decommissioning will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

Upon wellhead and flowline decommissioning, a grab soil sample will be collected at the base of the wellhead excavation. Additionally, soil samples will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Field screenings will be collected every 250' along the flowline alignment. All soil samples collected during decommissioning will be analyzed for full ECMC Table 915-1 constituents in accordance with initial site investigation plan (Doc. #403987230). Concurrently with the remedial excavation, background samples (5+) will be collected and submitted for ECMC Table 915-1 inorganics and metals constituents. A proposed remedial excavation location and background sampling figure will be proposed on 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.

During peripheral new construction of an adjacent pipeline to the Kreps 1 flowline, subsurface impacts were observed on 10/31/2024. These impacts were reported as a spill to ECMC on Form 19 Doc #403984180. The organic exceedances observed the site were removed through a remedial excavation on 11/14/2024. Approximately 80 cubic yards of impacted material was removed and transported to the Waste Management Ault, CO Landfill for disposal.

The ethyl-benzene, 1,2,4-Trimethyl-Benzene (TMB), 1,3,5-TMB, naphthalene, 1-methylnaphthalene (M), 2-M, benzo (a) anthracene, naphthalene, and TPH exceedances identified following the initial excavation conducted on 11/14/2024, at sample location Waste Char (north excavation sidewall), will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. The excavation size is anticipated to be 15 feet (ft) x 15ft x 9ft. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

REMEDICATION 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.

The organic exceedances observed at sample location Waste Char (north excavation sidewall) will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

Upon wellhead and flowline decommissioning, a grab soil sample will be collected at the base of the wellhead excavation. Additionally, soil samples will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Field screenings will be collected every 250' along the flowline alignment. All soil samples collected during decommissioning will be analyzed for full ECMC Table 915-1 constituents in accordance with initial site investigation plan (Doc. #403987230). Concurrently with the remedial excavation, background samples (5+) will be collected and submitted for ECMC Table 915-1 inorganics and metals constituents. A proposed remedial excavation location and background sampling figure will be proposed on a subsequent Form 27.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)	Yes	Excavate and offsite disposal
_____ Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) _____ 80
_____ Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or ECMC Facility ID # _____
_____ Natural Attenuation	No	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.

During the excavation conducted on 11/14/2024, groundwater was encountered at approximately 6 ft bgs. One grab groundwater sample was collected (GW-1). The groundwater sample was submitted for full ECMC Table 915-1 analysis. Upon receipt of analytical data, GW-1 was observed to be below ECMC Table 915-1 reporting limits.

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.

- Source mass removal is not complete but will be completed tentatively by the end of 2Q 2026.

Results shall be reported in a Supplemental Form 27. 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 80

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Waste Management Ault, CO 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? 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. 11/01/2024

Actual Spill or Release date, or date of discovery. 10/31/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/01/2024

Proposed site investigation commencement. 11/23/2024

Proposed completion of site investigation. 06/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/04/2024

Proposed date of completion of Remediation. 06/30/2025

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 modified to reflect the completion of decommissioning at the Kreps 1 wellhead and flowline, as well as the necessity for remedial excavation adjacent to the site. The proposed site investigation is tentatively scheduled for completion by the end of 2Q 2026.

OPERATOR COMMENT

This Form 27 is being submitted to provide a 4Q 2025 timeline update for the Kreps 1 (REM #38153). No work has been completed since the previous quarterly update. Remediation and site investigation is now under the direction of Montrose Environmental (Montrose). In response to ECMC Form 27 Comment dated 10/27/2025 (Doc. #404308331), Landman access has been requested and is awaiting review.

The organic exceedances observed at sample location Waste Char (north excavation sidewall) during the initial decommissioning will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

Upon wellhead and flowline decommissioning, a grab soil sample will be collected at the base of the wellhead excavation. Additionally, soil samples will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Field screenings will be collected every 250' along the flowline alignment. All soil samples collected during decommissioning will be analyzed for full ECMC Table 915-1 constituents in accordance with initial site investigation plan (Doc. #403987230). Concurrently with the remedial excavation, background samples (5+) will be collected and submitted for ECMC Table 915-1 inorganics and metals constituents. A proposed remedial excavation location and background sampling figure will be proposed on a subsequent Form 27.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the site investigation will be submitted within 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: 01/08/2026

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: 38153

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
404479865	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>	01/12/2026

Total: 1 comment(s)