

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Kari Brown

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37775 Initial Form 27 Document #: 403979743

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: LOCATION	Facility ID: 330879	API #: _____	County Name: WELD
Facility Name: SUCCO-62N66W 20SESW	Latitude: 40.117658	Longitude: -104.801760	
	** correct Lat/Long if needed: Latitude: 40.117866	Longitude: -104.794151	
QtrQtr: SESW	Sec: 20	Twps: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Cropland
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

Residential Water Well (DWR Permit # 5431) 0.25 miles W
Freshwater Pond 0.22 Miles NW, 0.25 Miles NW
Residential Structure 0.24 Miles W, 0.16 Miles SW, 0.18 Miles SE,
Farm Structure 0.23 Miles NW

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	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.

The former tank battery was decommissioned on January 24, 2017 and received a NFA status on 2/24/2017 (Rem# 10056, Doc# 401216820). Following receipt of analytical results collected by a third party operator for tank battery decommissioning activities adjacent to the former location, it was determined that potential hydrocarbon impacts were recorded at the ground surface in the vicinity of the former Succo 44-20 separator location. Per the ECMC request on October 28, 2024, a site investigation was conducted at the former PDC Legacy - Succo 44-20 tank battery location.

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):

One (1) grab soil sample was collected at sample location background@surface on 11/05/2024. On 1/6/2025, one soil boring (BH01) was advanced at this location and four soil borings (BH02-BH05) were advanced in the cardinal directions to delineate the horizontal and vertical extents of potential hydrocarbon impacts. Two soil samples were collected from each soil boring. All soil samples were analyzed by a certified laboratory for the full extent of ECMC Table 915-1, including but not limited to: TPH (C6-C36), 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):

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):

[Empty box for surface water sampling details]

Additional Investigative Actions

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

Visual inspection of the tank battery area occurred during site investigation activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 11
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 0.868
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 1

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?

Were background samples collected as part of this site investigation?

On 01/06/2025, fifteen background samples were collected from five soil borings (BKG01-BKG05). Background samples were collected from depths ranging between approximately 0-6 inches (in) to 5 feet below ground surface (ft. bgs). All background samples collected were analyzed for ECMC Table 915-1 inorganics and metals. The maximum background concentration for pH was reported as 9.40. The maximum background concentrations arsenic, barium, cadmium and lead including the 1.25x multiplier were calculated to be 6.550 mg/kg, 231.3 mg/kg, 0.540 mg/kg, and 15.63 mg/kg, respectively. Selenium was not detected in the background samples. The analyzed samples were within ECMC Table 915-1 standards/maximum background concentrations except for cadmium, lead, and/or selenium in soil sample locations background@surface, BH01@0-6", BH02@0-6", BH03@0-6", BH04@0-6" and BH05@0-6".

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 conducted to collect additional background soil samples (5+). Background samples will be analyzed for PAH, metals, and inorganics in soil per ECMC Table 915-1 to determine if the observed benzo(a)anthracene, cadmium, lead, and selenium exceedances at the former tank battery are attributed to native soil conditions at the site or potential clearing and burning along the ditch. The SSI will be completed per the proposed background sample location map attached to the "In Process" ECMC Form 27 (Doc. #404174167).

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.

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.

An SSI will be conducted to collect additional background soil samples (5+). Background samples will be analyzed for PAH, metals and inorganics in soil per ECMC Table 915-1 to determine if the observed benzo(a)anthracene, cadmium, lead and selenium exceedances at the former tank battery are attributed to native soil conditions at the site or potential clearing and burning along the ditch. The SSI will be completed per the proposed background sample location map attached to the "In Process" ECMC Form 27 (Doc. #404174167).

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 initial decommissioning and site investigation activities.

REMEDATION 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 Quarterly 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.
-Additional sample investigation and/or remediation is needed.

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? 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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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. 01/06/2025

Proposed date of completion of Reclamation. 12/31/2028

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/28/2024

Proposed site investigation commencement. 01/06/2025

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 modified to reflect the completion of the initial site investigation at the Succo 44-20 tank battery location, as well as the necessity for additional SSI activities adjacent to the site. The proposed site investigation is tentatively scheduled for completion by the end of 1Q 2026.

OPERATOR COMMENT

This Form 27 is being submitted to provide a 1Q 2026 update for the Succo 44-20 tank battery location (REM #37775). No work has been completed since the previous quarterly update. Two previously submitted remediation workplans (Doc. #404174167 and Doc. #404397581) are currently "In Process" on Web Forms. Active negotiations with landowner are in progress regarding access terms and timing to complete the site investigation.

An SSI will be conducted to collect additional background soil samples (5+). Background samples will be analyzed for PAH, metals and inorganics in soil per ECMC Table 915-1 to determine if the observed benzo(a)anthracene, cadmium, lead and selenium exceedances at the former tank battery are attributed to native soil conditions at the site or potential clearing and burning along the ditch. The SSI will be completed per the proposed background sample location map attached to the "In Process" ECMC Form 27 (Doc. #404174167).

In response to ECMC Form 27 comment dated 11/04/2025 (Doc. #404299712), the remedial site investigation proposed is of the Operator's highest priority and the change in schedule is reflected within the current form. The updated timeline takes in account the necessity for additional sample collection to determine the cause of exceedances at the site. Operator must complete the SSI in order to fully understand the impacts and to propose further remediation in accordance with ECMC 900 series regulations. The proposed work will be completed by the end of 1Q 2026.

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: Richie Blessing

Title: Environmental Consultant

Submit Date: 02/02/2026

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: 37775

COA Type

Description

<u>COA Type</u>	<u>Description</u>
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

404522660	FORM 27 DENIED
404537778	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

Environmental	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. 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. 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.	02/09/2026
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Total: 1 comment(s)