

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:

404486130

Date Received:

12/24/2025

Spill report taken by:

Elnajdi, Abdul

Spill/Release Point ID:

491706

### SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to ECMC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

### OPERATOR INFORMATION

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

Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

### INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 404370809

Initial Report Date: 09/27/2025 Date of Discovery: 09/26/2025 Spill Type: Historical Release

#### Spill/Release Point Location:

QTRQTR SWSE SEC 7 TWP 6N RNG 63W MERIDIAN 6

Latitude: 40.494791 Longitude: -104.476421

Municipality (if within municipal boundaries): No County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

Check this box if this spill/release is related to a loss of integrity of a flowline, pipeline, crude oil transfer line, or produced water transfer line.

#### Reference Location:

Facility Type: TANK BATTERY  Facility/Location ID No 472915

Spill/Release Point Name: Trinity 34-7, 33, 44-7  Well API No. (Only if the reference facility is well) 05- -

No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): Unknown Estimated Condensate Spill Volume(bbl): Unknown

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): Unknown

Estimated Other E&P Waste Spill Volume(bbl): 0 Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: \_\_\_\_\_

Has the subject Spill/Release been controlled at the time of reporting? Yes

**Land Use:**

Current Land Use: NON-CROP LAND Other(Specify): \_\_\_\_\_

Weather Condition: 70s and Sunny

Surface Owner: FEE Other(Specify): \_\_\_\_\_

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

On 9/26/2025, the potential presence of impacted material(s) was identified via hydrocarbon odor during tank battery decommissioning activities at the Trinity 34-7, 33, 44-7 above ground storage tank, soil sample AST01. Final laboratory analytical results received on 11/04/2025, indicate the soil sample AST01 and AST02, exceeded ECMC Table 915 standards for Benzene, Toluene, Ethyl-Benzene, Xylenes, 1,2,4-TrimethylBenzene, 1,3,5-TrimethylBenzene, Naphthalene, TPH, Benzo(a)Anthracene, Fluorene, 1-Methyl-Naphthalene, and 2-MethylNaphthalene. Groundwater was not encountered during decommissioning activities. This location is within 300 feet of Mule Deer Severe Winter Range, Pronghorn Winter Concentration High Priority Habitat and is also within 300 feet of state waters. A supplemental Form 27 has been submitted for remediation project number 39785 detailing the remedial site plan, document number: 404422971.

**List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):**

**OTHER NOTIFICATIONS**

| <u>Date</u> | <u>Agency/Party</u> | <u>Contact</u> | <u>Phone</u> | <u>Response</u>           |
|-------------|---------------------|----------------|--------------|---------------------------|
| 9/27/2025   | CPW                 | Andrew Newman  | ---          |                           |
| 9/27/2025   | PDC Land            | Landowner      | ---          | Email/verbal notification |
| 9/27/2025   | Weld County         | David Burns    | ---          |                           |
| 9/27/2025   | Weld County         | Brett Cavanagh | ---          |                           |
| 9/27/2025   | ECMC                | Abdul Elnajdi  | ---          |                           |

**REPORT CRITERIA**

**Rule 912.b.(1) Report to the Director (select all criteria that apply):**

Yes Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: Threatened to Impact Public Water System: n/a  
 Residence or Occupied Structure: n/a Livestock: n/a  
 Wildlife: Threatened to Impact Publicly-Maintained Road: n/a

No Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery \_\_\_\_\_ (HH:MM)  
 Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 \_\_\_\_\_  
 Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? \_\_\_\_\_  
 Enter the Document Number of the Initial Accident Report, Form 22 \_\_\_\_\_  
 Was there damage during excavation? \_\_\_\_\_  
 Was CO 811 notified prior to excavation? \_\_\_\_\_

No Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): \_\_\_\_\_

No Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:

The presence of free product or hydrocarbon sheen Surface Water

The presence of free product or hydrocarbon sheen on Groundwater

The presence of contaminated soil in contact with Groundwater

The presence of contaminated soil in contact with Surface water

Yes Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylight from the subsurface.

No Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.

Areas offsite of Oil & Gas Location  Off-Location Flowline right of way

No Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.

No Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

### SPILL/RELEASE DETAIL REPORTS

#1 Supplemental Report Date: 12/24/2025

| FLUIDS          | BBL's SPILLED | BBL's RECOVERED | Unknown                             |
|-----------------|---------------|-----------------|-------------------------------------|
| OIL             | _____         | _____           | <input checked="" type="checkbox"/> |
| CONDENSATE      | _____         | _____           | <input checked="" type="checkbox"/> |
| PRODUCED WATER  | _____         | _____           | <input checked="" type="checkbox"/> |
| DRILLING FLUID  | 0             | 0               | <input type="checkbox"/>            |
| FLOW BACK FLUID | 0             | 0               | <input type="checkbox"/>            |
| OTHER E&P WASTE | 0             | 0               | <input type="checkbox"/>            |

specify: \_\_\_\_\_

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

*Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.*

**A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit**

Impacted Media (Check all that apply)  Soil  Groundwater  Surface Water  Dry Drainage Feature

Surface Area Impacted: \_\_\_\_\_ Length of Impact (feet): \_\_\_\_\_ Width of Impact (feet): \_\_\_\_\_

Depth of Impact (feet BGS): 1 Depth of Impact (inches BGS): \_\_\_\_\_

How was extent determined?

The extent of impacts will be determined through an environmental site assessment. A remedial site plan has been submitted on a supplemental form 27, document number: 404422971. The impacted soil will be remediated per the supplemental form 27, document number: 404422971.

Soil/Geology Description:

SW – Well Graded Sand

Depth to Groundwater (feet BGS) 12 Number Water Wells within 1/2 mile radius: 12

If less than 1 mile, distance in feet to nearest

|            |             |  |                   |             |  |
|------------|-------------|--|-------------------|-------------|--|
| Water Well | <u>1047</u> | None <input type="checkbox"/>            | Surface Water     | <u>295</u>  | None <input type="checkbox"/>            |
| Wetlands   | <u>627</u>  | None <input type="checkbox"/>            | Springs           | _____       | None <input checked="" type="checkbox"/> |
| Livestock  | _____       | None <input checked="" type="checkbox"/> | Occupied Building | <u>1441</u> | None <input type="checkbox"/>            |

Additional Spill Details Not Provided Above:

The impacted soil will be remediated per the supplemental form 27, document number: 404422971.

## CORRECTIVE ACTIONS

#1 Supplemental Report Date: 12/24/2025

Root Cause of Spill/Release Unknown (Historical)

Other (specify) \_\_\_\_\_

Type of Equipment at Point of Spill/Release: Other

If "Other" selected above, specify or describe here:

Aboveground Storage Tank

Describe Incident & Root Cause (include specific equipment and point of failure)

The potential presence of impacted material(s) was identified during tank battery decommissioning activities beneath the aboveground storage tank. The volume of potentially impacted material(s) is not currently known. Due to the historical nature of the release, an exact cause was not able to be identified.

Describe measures taken to prevent the problem(s) from reoccurring:

PDC conducts routine AVO inspections of all oil and gas facilities in order to identify and mitigate potential releases. Further, this facility is no longer active and is in the process of being decommissioned. The aboveground storage tank has been taken out of service and there is no longer a possibility of a release originating from this infrastructure.

Volume of Soil Excavated (cubic yards): 0

Disposition of Excavated Soil (attach documentation)  Offsite Disposal  Onsite Treatment  
 Other (specify) \_\_\_\_\_

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbls): 0

## REQUEST FOR CLOSURE

**Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.**

- Basis for Closure:
- Corrective Actions Completed (documentation attached, check all that apply)
    - Horizontal and Vertical extents of impacts have been delineated.
    - Documentation of compliance with Table 915-1 is attached.
    - All E&P Waste has been properly treated or disposed.
  - Work proceeding under an approved Form 27 (Rule 912.c).  
Form 27 Remediation Project No: 39785
  - SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

## OPERATOR COMMENTS:

Final laboratory analytical results received on 11/04/2025, indicate the soil sample AST01 and AST02 discovered beneath the aboveground storage tank, exceeded ECMC Table 915 standards for:

- Benzene at 0.485 mg/kg,
- Toluene at 5.85 mg/kg,
- Ethyl-Benzene at 2.92 mg/kg,
- Xylenes at 22.2 mg/kg,
- 1,2,4-TrimethylBenzene at 17.9 mg/kg,
- 1,3,5-TrimethylBenzene at 5.62 mg/kg,
- Naphthalene at 8.59 mg/kg, 0.0181 mg/kg,
- TPH at 95,663 mg/kg, 17,100 mg/kg,
- Benzo(a)Anthracene at 1.78 mg/kg, 0.323 mg/kg

-Fluorene at 13.2 mg/kg, 1.80 mg/kg,  
 -1-Methyl-Naphthalene at 9.16 mg/kg, 1.18 mg/kg, and  
 -2-MethylNaphthalene at 11.0 mg/kg, 1.32 mg/kg, respectively.

In addition to the release at AST01 and AST02, the following releases are all located on the Trinity 34-7, 33, 44-7, but are not considered the same release:

-PWV01-W, Document number: 404486164

This is considered a separate release from AST01/AST02 location due to the distance separated.

A supplemental Form 27 has been submitted for remediation project number 39785 detailing the remedial site plan, document number: 404422971.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: \_\_\_\_\_ Print Name: Paulette Ozaeta  
 Title: HSE Advisor Date: 12/24/2025 Email: paulette.ozaeta@chevron.com

| <b>COA Type</b> | <b>Description</b>   |
|-----------------|--|
| 1 COA           | Quarterly reporting (90 days) is required under Remediation Project #39785. Operator shall include the Spill ID associated with this form on the subsequent Supplemental Form 27 and select Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912 in addition to the previous Rule selection. |

**ATTACHMENT LIST**

| <b>Att Doc Num</b> | <b>Name</b>                  |
|--------------------|------------------------------|
| 404486130          | FORM 19 SUBMITTED            |
| 404486156          | LABORATORY ANALYTICAL REPORT |
| 404486157          | OTHER                        |

Total Attach: 3 Files

**General Comments**

| <b>User Group</b> | <b>Comment</b> | <b>Comment Date</b> |
|-------------------|----------------|---------------------|
|                   |                | Stamp Upon Approval |

Total: 0 comment(s)