FORM 27 Rev 5/22

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 INFORMATON

Name of Operator: PDC ENERGY INC Operator No: 69175
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Lauren Hoff Email: RBUEUF27@chevron.com

Phone Numbers
Phone: (970) 304-5000
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36965 Initial Form 27 Document #: 403875036

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.
- [X] 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.
- [X] 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: WELL Facility ID: API #: 123-23592 County Name: WELD
Facility Name: PETTINGER 43-2 Latitude: 40.514030 Longitude: -104.509360
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESE Sec: 2 Twp: 6N Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 489445 API #: County Name: WELD
Facility Name: Pettinger 43-2 Latitude: 40.508229 Longitude: -104.510344
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESE Sec: 2 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? 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

Within Mule Deer Severe Winter Range HPH
Within Pronghorn Winter Concentration Area HPH
Freshwater Pond 0.21mi NW
Freshwater Emergent Wetland 0.17mi NE
Residential 0.1/0.14mi NE, 0.19mi N
Farm Structure 0.07/0.15/0.2mi NE, 0.07/0.09/0.2/0.21mi N

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	Refer to tables and figures	Lab analysis and field screening
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 was conducted pertaining to the Pettinger 43-2 wellhead cut & cap and flowline removal (REM 36965). The wellhead was cut and capped per ECMC rules on 11/07/2024. Approximately 2,147 feet of flowline was removed per ECMC rules between 12/13/2024 and 12/17/2024. A portion of the flowline was abandoned-in-place between sample locations FL01-05@4' and FL01-06@4' due to conflict with third party (DCP) lines and between FL01R-S@4' and FL01-13@4' due to field constraints. The ECMC was notified on Form 44, Doc. #404083777.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

A grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Grab confirmation soil samples were 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 collected were analyzed by a certified laboratory for the full extent of ECMC Table 915-1 using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

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

Groundwater was encountered at one location (GW01@4') during the 12/13/2024 flowline decommissioning. Three groundwater grab samples will be collected from locations upgradient of source sample GW01 for further groundwater site characterization. The background groundwater samples will be analyzed for Table 915-1 organic and inorganic constituents using ECMC approved methods. If additional 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 occurred during abandonment 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 9 -- Highest concentration of TPH (mg/kg) 630

Number of soil samples exceeeding 915-1 2 -- Highest concentration of SAR 3.54

Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No

Approximate areal extent (square feet) 200 Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 1 ND Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? No ND Highest concentration of Toluene (µg/l)

Depth to groundwater (below ground surface, in feet) 4 ND Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed 0 ND Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1 1 NA 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 12/13/2024, one (1) site specific background soil sample was collected near the flowline and was submitted for Table 915-1 inorganic and metal analysis. The background soil sample was collected from a depth of 4 feet below ground surface (ft bgs). The maximum background value for pH was observed to be 8.56. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, and lead were calculated to be 5.38 mg/kg , 31.5 mg/kg , 1.93 mg/kg, and 28.5 mg/kg, respectively. All constituents in the soil samples collected at the site are within Table 915-1/max background limits except for arsenic (6.23 mg/kg) and barium (105 mg/kg) at FL01-01@4'.

☐ 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 remedial excavation is being proposed to address the TPH exceedance identified at FL01R-W@4'. The proposed excavation dimensions are approximately 10 feet (ft) x 10 ft x 6 ft and will be centered on the FL01R-W location. Grab soil samples will be collected from the base and sidewalls of the remedial excavation. Remedial excavation samples will be submitted for analysis of the full ECMC Table 915-1 constituents. A proposed remedial excavation map is attached to this form.

Additionally, a Supplemental Site Investigation (SSI) will be completed to vertically and horizontally delineate the arsenic and barium exceedances identified in sample FL01-01@4'. The delineation samples will be analyzed for the full ECMC Table 915-1 constituents. Concurrently with the SSI, additional background samples (5+) will be collected from soil of native/similar lithologic material not impacted by oil and gas activity to determine if the arsenic and barium exceedances are attributable to native soil conditions at the site. The background samples will be analyzed for metals and inorganics in soil per ECMC Table 915-1. A proposed soil sample location figure is attached.

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.

The TPH exceedance identified during flowline decommissioning at soil sample location FL01R-S@4' will be removed through remedial excavation and the impacted soil will be segregated for proper off-site disposal. The proposed excavation dimensions are approximately 10 ft x 10 ft x 6 ft and will be centered on the FL01R-S location. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full ECMC Table 915-1 constituents.

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.

The TPH exceedance identified during flowline decommissioning at soil sample location FL01R-S@4' will be removed through remedial excavation and the impacted soil will be segregated for proper off-site disposal. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full ECMC Table 915-1 constituents. Concurrently with the remedial excavation, an SSI will be completed to collect additional background samples. Background soil samples (5+) will be collected from soil of native/similar lithologic material not impacted by oil and gas activity to determine if the arsenic and barium exceedances are attributable to native soil conditions at the site. The soil background samples will be analyzed for metals and inorganics in soil per ECMC Table 915-1. A proposed remedial excavation and soil sample location figure is attached.

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.

Three groundwater grab samples will be collected from locations upgradient of source sample GW01 for further groundwater site characterization. The background groundwater samples will be analyzed for Table 915-1 organic and inorganic constituents using ECMC approved methods. If additional 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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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

[X] Other SSI and SSMR Proposal

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 and groundwater investigation is required.
- Source mass removal 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: $ 50000

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:

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? No

Is additional groundwater monitoring to be conducted? Yes

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?

[X] 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. 11/07/2024

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. 06/13/2024

Actual Spill or Release date, or date of discovery. 02/10/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/07/2024

Proposed site investigation commencement. 05/05/2025

Proposed completion of site investigation. 06/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/30/2026

Proposed date of completion of Remediation. 12/31/2026

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.

[X] 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 decommissioning at the Pettinger 43-2 wellhead and flowline, as well as the necessity for remedial excavation and SSI activities adjacent to the flowline. The proposed remedial excavation and SSI activities are tentatively scheduled to be completed by the end of 2Q 2026. Qualified excavation crew is not immediately available but is expected to commence the work within 2Q 2026.

OPERATOR COMMENT

This form has been submitted to provide a 1Q 2026 update for the Pettinger 43-2 wellhead and flowline (REM #36965) and to propose supplemental investigation and source mass removal. 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 11/26/2025 (Doc. #404395871, Denied), qualified excavation crew is not immediately available but is expected to commence the work within 2Q 2026. The TPH exceedance identified during flowline decommissioning at soil sample location FL01R-S@4' will be removed through remedial excavation. The impacted soil will be segregated for proper off-site disposal. Remedial excavation confirmation soil samples will be collected from the base and sidewalls for full ECMC Table 915-1 analysis. Further, the proposed Site Investigation Plan has been re-submitted with this form due to modifications to the proposed site investigation. See the attached remedial excavation figure depicting the upcoming source removal activities.

Concurrently with the remedial excavation, an SSI will be completed to collect additional background samples. Background soil samples (5+) will be collected from soil of native/similar lithologic material not impacted by oil and gas activity to determine if the arsenic and barium exceedances are attributable to native soil conditions at the site. The soil background samples will be analyzed for metals and inorganics in soil per ECMC Table 915-1. A proposed soil sample location figure is attached.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of remedial excavation and the SSI 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: 02/18/2026 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: Abdul Elnajdi Date: 02/20/2026

Remediation Project Number: 36965

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
404515966	FORM 27-SUPPLEMENTAL-SUBMITTED
404538552	SITE INVESTIGATION PLAN

Total Attach: 2 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)