

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404577006
Receive Date:

Report taken by:

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 ECOM 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: DCP OPERATING COMPANY LP Operator No: 4680 Phone Numbers
Address: 2331 CITYWEST BLVD., S812-02 Phone: (970) 378-6373
City: HOUSTON State: TX Zip: 77042 Mobile: (970) 939-0329
Contact Person: Chandler Cole Email: chandler.e.cole@p66.com

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: Initial Form 27 Document #: 404471942

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: SPILL OR RELEASE Facility ID: 491898 API #: County Name: WELD
Facility Name: White Lakes (H-6-1-15) 10/2025 Latitude: 40.253527 Longitude: -104.244611
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NWSW Sec: 5 Twp: 3N Range: 61W 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

Mule Deer Severe Winter Range. Livestock rangeland.

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
Yes	SOILS	5625	Laboratory Data and Field Observations

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Initial investigation activities using mechanical excavation of impacted soil were performed between 10/7/2025 and 10/9/2025 and a source area soil sample was collected immediately beneath the pipeline approximately 5 feet (ft) below ground surface (bgs). The soil was field screened with a photoionization detector (PID) and standard headspace soil sampling techniques. A PID reading of 395.5 parts per million (ppm) as well as visual staining and petroleum hydrocarbon odor indicated petroleum hydrocarbon impacts to soil had occurred and soil investigation activities to determine vertical and horizontal extents of impacts was initiated. Vertical investigation continued in the immediate vicinity of the pipeline leak and a high PID reading of 719.1 ppm was observed at approximately 8 ft bgs. A soil sample was collected for laboratory analysis of the Table 915-1 constituents of concern (COC). Vertical investigation continued to a depth of 28 ft bgs and five base confirmation soil samples were collected for laboratory analysis during horizontal excavation to the north, south, east, and west. Sidewall samples were also collected at the locations illustrated on Figures 2 and 3 attached to the previously submitted Form 27-Initial (F27-I) (#404471942). Moisture in soil and/or groundwater were not observed during excavation activities. Background samples were also collected to the west, east, and north of the excavation areas sufficiently far enough from oil and gas operations at 5 ft and 28 ft bgs. Laboratory analytical data were summarized on Tables 1 through 3 and the secured and certified laboratory analytical reports were provided as separate attachments to the previously submitted Form 27-I (#404471942).

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):

Based on the analytical results, soil concentrations of the Table 915-1 analytes have been mitigated, apart from naphthalene at Base11@28' (Base01@28') which had a detected concentration of 0.0042 milligrams per kilogram (mg/kg). Additionally, cadmium was observed at Base03@28' with a detected concentration of 0.511 mg/kg. Both values are above the ECOMC Table 915-1 protection of groundwater soil screening level concentrations but below the residential soil screening level concentrations. Since cadmium was not detected in either of the most impacted soil samples (Source01@4' and Base01@8') nor any shallower sidewall samples throughout investigation and remediation activities, DCP asserts that the cadmium value is anomalous and not associated with spilled material from the DCP gathering line. DCP proposes to perform drilling and soil sampling at the Base11@28' (Base01@28') sample location to evaluate vertical extents of naphthalene at that location.

Proposed Groundwater Sampling

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

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):

DCP proposes to perform drilling and soil sampling for naphthalene at the Base01 sample location to evaluate the vertical extent and concentrations at that location. If naphthalene concentrations are observed below the Table 915-1 protection of groundwater soil screening level standards within the vadose zone, and above groundwater, DCP will request closure of the remediation project under the Table 915-1 residential soil screening level standards. If groundwater is encountered during drilling and naphthalene concentrations continue to be observed above the protection of groundwater standard, a groundwater monitoring well will be installed for subsequent groundwater monitoring. The proposed investigation activities will be scheduled pending the approval of the previously submitted F27-I #404471942 and assignment of a remediation number, per ECOMC 900 series rules.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 36

Number of soil samples exceeding 915-1 36

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 5625

NA / ND

-- Highest concentration of TPH (mg/kg) 65900

-- Highest concentration of SAR 3.54

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 28

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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?

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 670

Volume of liquid waste (barrels) 0

Is further site investigation required?

DCP proposes to perform drilling and soil sampling for naphthalene at the Base01 sample location to evaluate the vertical extent and concentrations at that location. If naphthalene concentrations are observed below the Table 915-1 protection of groundwater soil screening level standards within the vadose zone, and above groundwater, DCP will request closure of the remediation project under the Table 915-1 residential soil screening level standards. If groundwater is encountered during drilling and naphthalene concentrations continue to be observed above the protection of groundwater standard, a groundwater monitoring well will be installed for subsequent groundwater monitoring. The proposed investigation activities will be scheduled pending the approval of the previously submitted F27-I #404471942 and assignment of a remediation number, per ECOM 900 series rules.

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.

Initial investigation activities using a third-party environmental consultant were conducted using PID screening, olfactory and visual observation, and confirmation soil samples. Mechanical excavation of impacted soil was performed between 10/7/2025 and 10/9/2025 and approximately 870 tons/670 cubic yards of soil were excavated and transported to the Waste Management Buffalo Ridge Landfill in Keenesburg, CO for disposal. Clean overburden material between the surface and approximately 5' bgs throughout the excavation area was stockpiled outside of the main work area while impacted soil was being removed. Soil samples were collected from stockpiled material and two stockpile soil samples (SP03 and SP05) were collected from the clean stockpiles and verified to be below Table 915-1 standards and/or within background concentrations. The stockpiles were used for backfilling subsequent to excavation completion. Additional stockpiled material was transported to the Waste Management Buffalo Ridge landfill for disposal.

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.

Mechanical excavation of impacted soil was performed between 10/7/2025 and 10/9/2025 and approximately 870 tons/670 cubic yards of soil was excavated and transported to the Waste Management Buffalo Ridge Landfill in Keenesburg, CO for disposal.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 670

_____ 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.

Not Applicable at this time.

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 Schedule and Remediation Plan 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.

DCP maintains appropriate comprehensive general liability insurance to satisfy the requirements of Rule 705.B, with at least \$5MM in coverage and including coverage for sudden and accidental release events. The cost provided below for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. DCP makes no representation or guarantees as the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 20000

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:

Approximately 670 cubic yards of impacted soil from excavation activities was disposed of at the Waste Management – Buffalo Ridge Landfill.

Volume of E&P Waste (solid) in cubic yards 670

E&P waste (solid) description Impacted Soils

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill, Keenesburg, CO

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? _____

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.

The excavation area has been backfilled and compacted with imported clean structural fill material and unimpacted native material to match the surrounding landscape and pre-excitation conditions. Subsequent to additional investigation activities described herein, the site will be reclaimed in accordance with Series 900 and 1000 Rules. A reclamation plan will be submitted for ECMC review, if applicable.

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. 10/02/2025

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/07/2025

Proposed site investigation commencement. 06/30/2026

Proposed completion of site investigation. 12/31/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/07/2025

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.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The proposed investigation activities will be scheduled pending the approval of the previously submitted F27-I and assignment of a remediation number, per ECMC 900 series rules.

OPERATOR COMMENT

From October 7 to October 9, 2025, approximately 870 tons (670 cubic yards) of impacted soil were mechanically excavated and transported to the Waste Management Buffalo Ridge Landfill in Keenesburg, CO for disposal. Soil samples were collected during the excavation at the locations indicated in Figures 2 and 3 attached to the previously submitted Form 27-I (#404471942). Observations confirmed no moisture in the soils or groundwater. Background samples were taken to the west, east, and north of the excavation areas, at depths of 5 feet and 28 feet below ground surface (bgs), sufficiently distant from oil and gas operations. The laboratory analytical data were summarized in Tables 1 through 3, with the certified reports provided as separate attachments to previously submitted Form 27-I (#404471942). Clean overburden material from the surface to approximately 5 feet bgs was stockpiled outside the main work area during the excavation. Two soil samples (SP03 and SP05) from this stockpiled material were confirmed to be below Table 915-1 standards and/or within background concentrations. This material was used for backfilling after the excavation was completed, with the excess transported to the landfill for disposal. Analytical results indicate that the concentrations of Table 915-1 analytes have been mitigated, except for naphthalene and cadmium. Naphthalene at Base11@28' [Base01@28'] was detected at 0.0042 mg/kg, and cadmium at Base03@28' was 0.511 mg/kg. While both concentrations exceed the ECMC Table 915-1 protection of groundwater soil screening levels, they are below residential soil screening levels. Notably, cadmium was not found in the most impacted soil samples (Source01@4' and Base01@8') or in sidewall samples from shallower locations, leading DCP to consider the cadmium concentration anomalous and unrelated to the DCP gathering line spill.

DCP proposes drilling and soil sampling at the Base11@28' [Base01@28'] location to evaluate the vertical extent of naphthalene. If naphthalene concentrations below the Table 915-1 protection of groundwater soil screening level are found in the vadose zone above groundwater, DCP will seek closure of the remediation project under residential soil screening level standards. However, should groundwater be encountered and naphthalene concentrations remain above the protection of groundwater standard, a groundwater monitoring well will be installed for ongoing monitoring. The proposed investigation activities will be scheduled pending the approval of the previously submitted F27-I #404471942 and assignment of a remediation number, per ECMC 900 series rules. This Form 27-Supplemental is being submitted as a 90-day compliance and schedule update.

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

Signed: Chandler Cole

Title: Environmental Specialist

Submit Date: _____

Email: ECMCnotification@p66.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: _____

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

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Total Attach: 0 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)