

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:  
404590232  
Receive Date:  
04/08/2026

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: <u>PDC ENERGY INC</u>	Operator No: <u>69175</u>	Phone Numbers Phone: <u>(970) 304-5000</u> Mobile: <u>( )</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 42507 Initial Form 27 Document #: 404313364

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

Yes  Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-39754</u>	County Name: <u>WELD</u>
Facility Name: <u>Suden 34U-403</u>	Latitude: <u>40.362509</u>	Longitude: <u>-104.530211</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>34</u>	Twp: <u>5N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>492360</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SUDEN 34U-403</u>	Latitude: <u>40.362507</u>	Longitude: <u>-104.530234</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>34</u>	Twp: <u>5N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## 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? No \_\_\_\_\_

Is groundwater less than 20 feet below ground surface? No \_\_\_\_\_

### **Other Potential Receptors within 1/4 mile**

Residential 0.23mi W  
Farm Structure 0.22/0.23mi E, 0.21/0.23mi W  
Radio Tower 0.16mi E

# 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
UNDETERMINED	GROUNDWATER	NA	Lab Analysis or 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 was conducted pertaining to the SUDEN 34U-403 wellhead cut and cap and flowline abandonment. The wellhead was cut and capped per ECMC rules on 10/31/2025. Approximately 485' of flowline was abandoned-in-place along with abandonment of a fuel supply line (204803) on 11/4/2025. This flowline lies in a common trench with at least one other line. So as to not disturb the other line(s) sharing the common trench, soil samples were only taken at the wellhead and at the endpoint of the flowline.

The Field Qualitative Criteria Checklist was utilized during wellhead decommissioning activities and olfactory observations indicated a potential historical release occurred and an initial Form 19 was submitted under Document Number 404420419. The final lab results for the wellhead decommissioning activities were below Table 915-1 limits for all organic compounds.

## 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 ):

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. A grab confirmation soil sample was collected at the wellhead excavation and start/end points of the flowline. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were analyzed 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. All samples collected were analyzed using approved ECMC laboratory analysis methods.

### Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters 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. The ECMC Flowline Closure and Wellhead Closure Checklists were utilized and filled out during the abandonment process. A detailed summary of flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 1  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 0

### NA / ND

-- Highest concentration of TPH (mg/kg) 13.2  
-- Highest concentration of SAR 0.586  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 0

### 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  
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?

Three background soil samples were collected on 10/31/25 from an area not impacted by oil and gas development and at depths and lithologies (clayey sands – SC, well-graded sands - SW, & poorly-graded sands - SP) comparable to those of the confirmation soil samples collected at the location. The samples were analyzed by a certified laboratory for Table 915-1 metals and SSR parameters using ECMC approved Methods. Based on the background analytical results summarized below, the following Table 915-1 metal parameters were within the maximum observed background values (metals listed in mg/kg):

Arsenic Max\*1.25 = 7.0

Additional background samples will be collected to determine site specific background concentrations of barium.

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 completed to collect additional background samples to determine if elevated levels of barium are attributed to native soil conditions at the site. The proposed background sample locations are included in the attached Site Map. Background soil samples will be analyzed by a certified laboratory for analysis of metals per ECMC Table 915-1 and soil suitability for reclamation parameters including pH, EC, SAR, and boron. The results of the SSI will be submitted 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.

The Field Qualitative Criteria Checklist was utilized during decommissioning activities and olfactory observations indicated a potential historical release occurred and an initial Form 19 was submitted under Document Number 404420419. Final laboratory results indicate all organic compounds were below ECMC Table 915-1 Limits for all soil samples.

On 10/31/2025, 8 cubic yards of potentially impacted material at the wellhead was removed and hauled to a permitted disposal facility, Tower Landfill in Commerce City, CO, in accordance with Rules 905 and 906. Confirmation samples collected after excavation were analyzed for the full Table 915-1 suite, and results indicated all organic impacts have been removed. Refer to the Remediation Summary and Operator Comment sections for additional work planned to address remaining inorganic impacts. Refer to the Remediation Summary and Operator Comment sections for additional work planned to address remaining inorganic impacts. Copies of the waste manifests are available upon request.

## 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.

A supplemental site investigation (SSI) will be completed to collect additional background samples to determine if elevated levels of barium are attributed to native soil conditions at the site. The proposed background sample locations are included in the attached Site Map. Background soil samples will be analyzed by a certified laboratory for analysis of metals per ECMC Table 915-1 and soil suitability for reclamation parameters including pH, EC, SAR, and boron. The results of the SSI will be submitted 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) \_\_\_\_\_ 8

\_\_\_\_\_ 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.

Groundwater was not encountered during site investigation or excavation activities. If groundwater is encountered at the site, groundwater sampling will be conducted in accordance with the Proposed Groundwater Sampling section in this Form 27.

# 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 Decommissioning Sample Summary & Supplemental Site Investigation Proposal, Backgrounds

## 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 11 requirements of Rule 705.b. Operator does not anticipate making an insurance claim for this project.

- Further soil investigation 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: \$ 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:

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

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Tower Landfill

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? 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. 10/31/2025

Proposed date of completion of Reclamation. 10/31/2027

## 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. 08/05/2025

Actual Spill or Release date, or date of discovery. 10/31/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/31/2025

Proposed site investigation commencement. 04/30/2026

Proposed completion of site investigation. 09/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/30/2026

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 changed due to the decommissioning of the SUDEN 34U-403 wellhead and flowline and necessity for supplemental site investigation activities adjacent to the wellhead and flowline. The ECMC will be notified of any update to the implementation schedule on a supplemental Form 27.

**OPERATOR COMMENT**

This Form 27 is being submitted to include a 2Q 2026 update and the decommissioning results for the SUDEN 34U-403 wellhead and flowline (REM #42507). Flowline decommissioning activities occurred on 11/4/2025 and is being reported in this Form 27. A supplemental site investigation (SSI) will be completed to collect additional background samples to determine if elevated levels of barium are attributed to native soil conditions at the site. The results of the SSI will be submitted on a subsequent Form 27.

Based on olfactory observations on 10/31/2025 a potential historic release was reported for sample location WH01-S@4' under Form 19 Document Number 404420419. The final lab results for the wellhead cut and cap sampling were below Table 915-1 limits or non-detect for all organic compounds.

Three background soil samples were collected on 10/31/25 from an area not impacted by oil and gas development and at depths and lithologies (clayey sands – SC, well-graded sands - SW, & poorly-graded sands - SP) comparable to those of the confirmation soil samples collected at the location. The samples were analyzed by a certified laboratory for Table 915-1 metals and SSR parameters using ECMC approved Methods. Based on the background analytical results summarized below, the following Table 915-1 metal parameters were within the maximum observed background values (metals listed in mg/kg):  
Arsenic Max\*1.25 = 7.0  
Additional background samples will be collected to determine site specific background concentrations of barium.

On 10/31/2025, source mass removal was conducted and 8 cubic yards of impacted material was removed at the wellhead and hauled to a permitted disposal facility, Tower Landfill in Commerce City, CO, in accordance with Rules 905 and 906. Confirmation samples collected after excavation were analyzed for the full Table 915-1 suite, and results indicated all organic impacts have been removed. Copies of the waste manifests are available upon request.

Pursuant to Rule 913.e, quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation 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: Kayla White, P.E.

Title: Environmental Consultant

Submit Date: 04/08/2026

Email: CVX-PM@cdhconsult.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: 04/09/2026

Remediation Project Number: 42507

**COA Type**

**Description**

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.
1 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.

<b>Att Doc Num</b>	<b>Name</b>
404590232	FORM 27-SUPPLEMENTAL-SUBMITTED
404590716	LABORATORY ANALYTICAL REPORT
404592743	SITE INVESTIGATION REPORT

Total Attach: 3 Files

**General Comments**

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

Total: 0 comment(s)