

State of Colorado  
Energy & Carbon Management Commission

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404613959  
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Report taken by:  
Nick Cholas

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 43807 Initial Form 27 Document #: 404470982

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: LOCATION	Facility ID: 479201	API #: _____	County Name: WELD
Facility Name: KISSLER K-64N66W 21SESW	Latitude: 40.293877	Longitude: -104.786331	
** correct Lat/Long if needed: Latitude: 40.293898		Longitude: -104.786322	
QtrQtr: SESW	Sec: 21	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 493595	API #: _____	County Name: WELD
Facility Name: KISSLER K-64N66W 21SESW	Latitude: 40.293667	Longitude: -104.786529	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 21	Twp: 4N	Range: 66W 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? No

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

Riverine 0.01mi SE  
Freshwater Pond 0.06mi S, 0.14/0.16mi NE  
Residential 0.18mi SW, 0.23/0.25mi W  
Farm Structure 0.14mi SW, 0.22/0.23/0.24mi W

**DENIED**

# 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 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.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the KISSLER K-64N66W 21SESW facility and tank battery. The facility and tank battery were decommissioned per ECMC rules on 02/25/2026. Grab soil samples were collected at the produced water vessel excavation, the aboveground oil storage tank, and at dumplines for the separators. Additionally, soil samples were field screened at the N-E-S-W sidewalls of the produced water vessel excavation.

## 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 ):

Grab soil samples were collected at the produced water vessel(s) excavation, beneath the aboveground oil storage tank(s), and dumpline(s) of the separator(s). In addition, the on-site dump lines located between the separator and the tank battery were removed by pulling from both ends. Soil samples were analyzed by a certified laboratory 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 were analyzed by a certified laboratory 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 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 tank battery area occurred during decommissioning activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The ECMC Tank Battery and Produced Water Vessel Closure Checklists were utilized and filled out during the abandonment process.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 9

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_

Number of soil samples exceeding 915-1 7

Highest concentration of SAR \_\_\_\_\_

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

BTEX > 915-1 No

Approximate areal extent (square feet) 700

Vertical Extent > 915-1 (in feet) 4

**Groundwater**

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? Yes

Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) \_\_\_\_\_

Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed \_\_\_\_\_

Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 \_\_\_\_\_

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?

Empty text box for impacts to adjacent property or offsite impacts identified.

Were background samples collected as part of this site investigation?

During decommissioning activities conducted on 02/26/2026, twelve background soil samples were collected from three soil borings (BKG01-BKG03). The background samples were collected at depths ranging from 0.5 to 4 feet below ground surface (ft bgs). All background samples were analyzed for ECOMC Table 915-1 inorganic and metal constituents. The maximum background concentration for pH was 8.25 standard units. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, lead, and selenium were calculated to be 6.24 mg/kg, 127.5 mg/kg, 0.979 mg/kg, 40.88 mg/kg, and 0.465 mg/kg, respectively. All constituents in the soil samples collected at the site are within Table 915-1/maximum background limits except for pH (PWV01-FS@4'), barium (PWV02-FS@4', PWV03-FS@4', and PWV-SS05@3'), and lead (AST02@0.5').

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?

The benzo(a)anthracene exceedances observed at sample locations PWV03-FS@4', PWV-SS05@3', AST02@0.5', SEP01-DL@2', and SEP02-DL@2' will be removed through remedial excavations, and the impacted soil will be segregated for proper off-site disposal. The barium exceedances at PWV03-FS@4' and PWVSS05@3', and the lead exceedance at AST02@0.5' will be encompassed within the remedial excavations. Remedial excavation confirmation soil samples will be collected and analyzed for full ECOMC Table 915-1 constituents. Concurrently, additional background samples (5+) will be collected and submitted for ECOMC Table 915-1 inorganic and metals analysis to determine if the pH, barium, and lead exceedances are attributable to native soil conditions at the site. See the attached proposed figure.

**REMEDIAL ACTION PLAN**

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

The benzo(a)anthracene exceedances identified at sample locations PWV03-FS@4', PWV-SS05@3', AST02@0.5', SEP01-DL@2', and SEP02-DL@2' during the decommissioning conducted on 2/25/26 will be removed through remedial excavations. Additionally, the barium (PWV3-FS@4' and PWV-SS05@3') and lead (AST02@0.5') exceedances will also be removed during the remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 19.5 ft x11 ft x 4 ft bgs for sample locations SEP01-DL@2' and SEP02-DL@2', 28.5 ft x12.5 ft x 6 ft bgs for sample locations PWV03-FS@4' and PWV05-SS@3', and 10 ft x10 ft x 2.5 ft bgs for AST02@0.5'. Remedial excavation confirmation soil samples will be collected from the base and sidewalls for full ECOMC Table 915-1 analysis. The proposed are depicted on the attached figure.

**REMIATION 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 Form 19 (Doc. #404574856; Spill ID 493595) was submitted for the former KISSLER K-64N66W 21SESW Facility and Tank Battery location (REM #43807) and has been added within the current form. Upon receiving final laboratory analytical results on 03/10/2026, soil sample locations SEP01-DL@2', SEP02-DL@2', PWV03-FS@4', PWV-SS05,@3', and AST02@0.5' were observed to exceed ECMC Table 915-1 standards for benzo (a)anthracene.

The remedial excavations outlined within the Source Removal Summary section are tentatively scheduled for completion by the end of 4Q 2026. The impacted soil will be segregated for proper off-site disposal. Remedial excavation confirmation soil samples will be collected at the excavation base and sidewalls for full ECMC Table 915-1 analysis. Concurrently, additional background samples (5+) will be collected and submitted for ECMC Table 915-1 inorganic and metals analysis to determine if the pH, barium, and lead exceedances are attributable to native soil conditions at the site.

### Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ 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 decommissioning activities.

# 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 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 an 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. Facility and infrastructure were decommissioned, and the location will be reclaimed in accordance with the ECMC 1000 Series. Pending required actions for this project include: (1) remedial excavation at sample locations PWV03-FS@4', PWV-SS05@3', AST02@0.5', SEP01-DL@2', and SEP02-DL@2' with off-site disposal of impacted soil; (2) collection and analysis of confirmation soil samples at excavation bases and sidewalls for full ECMC Table 915-1 constituents; and (3) collection and analysis of a minimum of five additional background soil samples for ECMC Table 915-1 inorganic and metal constituents.

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: \$ 65000

## 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? 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. 02/25/2026

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. 11/26/2025

Actual Spill or Release date, or date of discovery. 03/10/2026

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/25/2026

Proposed site investigation commencement. 02/25/2026

Proposed completion of site investigation. 12/31/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2026

Proposed date of completion of Remediation. 06/30/2027

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 decommissioning at the KISSLER K-64N66W 21SESW Tank Battery, as well as the necessity for Supplemental Source Mass Removal (SSMR) and background sampling activities at the site. The proposed remedial excavation is tentatively scheduled for completion by the end of 4Q 2026. The ECMC will be notified of any updates to the implementation schedule on a subsequent Form 27.

**OPERATOR COMMENT**

This Form 27 has been submitted to provide a 2Q2026 decommissioning sample summary for the KISSLER K-64N66W 21SESW Facility and Tank Battery (REM #43807) as well as to propose remedial excavation and supplemental investigation.

The tank battery was decommissioned on February 25, 2026. Decommissioning soil sampling included the collection of samples from the produced water vessel excavation, beneath the former aboveground storage tanks, and from separator dumpline locations. No visual or olfactory indicators of a release were encountered during decommissioning sampling. Decommissioning samples were analyzed for the full suite of ECMC Table 915-1 constituents. Concurrently, twelve background soil samples were collected from three soil borings (BKG01–BKG03) at depths ranging from 0.5 to 4 feet below ground surface (ft bgs) and analyzed for ECMC Table 915-1 inorganic and metal constituents. The maximum background pH concentration was 8.25 standard units. Maximum background concentrations, with a 1.25x multiplier applied, were calculated to be 6.24 mg/kg for arsenic, 127.5 mg/kg for barium, 0.979 mg/kg for cadmium, 40.88 mg/kg for lead, and 0.465 mg/kg for selenium.

Benzo(a)anthracene exceedances were identified in soil samples collected from PWV03-FS@4', PWV-SS05@3', AST02@0.5', SEP01-DL@2', and SEP02-DL@2' via final analytical results. In addition, pH at PWV01-FS@4', barium at PWV02-FS@4', PWV03-FS@4', and PWV-SS05@3', and lead at AST02@0.5' were observed at concentrations exceeding applicable ECMC Table 915-1 criteria and established native background levels. The data packet and associated laboratory analytical results are included with the current Form.

The benzo(a)anthracene-impacted soils will be addressed through remedial excavation, with impacted material segregated and disposed of at an approved off-site facility. The remedial excavation will also encompass the barium exceedances at PWV03-FS@4' and PWV-SS05@3', as well as the lead exceedance at AST02@0.5'. Confirmation soil samples will be collected following excavation and analyzed for the full ECMC Table 915-1 constituent list. Concurrently, a minimum of five additional background soil samples will be collected and analyzed for ECMC Table 915-1 inorganic and metal constituents to further evaluate whether the observed pH, barium, and lead exceedances are attributable to native soil conditions. Refer to the attached proposed figure for additional detail.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the remedial excavation and Supplemental Site Investigation (SSI) activities 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: 04/24/2026 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: 43807

<b>COA Type</b>	<b>Description</b>
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.

<b>Att Doc Num</b>	<b>Name</b>
404613959	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

**General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>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.</p> <p>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.</p> <p>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.</p>	04/30/2026

Total: 1 comment(s)

**DENIED**