

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:
404606795

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 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 #: 39021 Initial Form 27 Document #: 404066929

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>123-27375</u>	County Name: <u>WELD</u>
Facility Name: <u>FRANK 6LL</u>	Latitude: <u>40.269840</u>	Longitude: <u>-104.807810</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>32</u>	Twp: <u>4N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>493727</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Frank #6LL</u>	Latitude: <u>40.268340</u>	Longitude: <u>-104.807812</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>32</u>	Twp: <u>4N</u>	Range: <u>66W</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? No

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

A freshwater pond is 0.13 miles south of the Location. A residential structure is 0.18 miles southeast and farm structures are 0.19, 0.22, and 0.24 miles southeast and 0.21 miles west of the Location.

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
UNDETERMINED	GROUNDWATER	NA	Field-Screening and Laboratory Analysis, if Encountered
UNDETERMINED	SOILS	Yes	Field-Screening and Laboratory Analysis

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, site investigations were completed for the FRANK #6LL wellhead cut and cap and flowline removal. The flowline was temporarily abandoned in place on May 21, 2025, and the ECMC was notified via Form 44 Document 404380969. Following abandonment, two soil samples were collected from the end points on May 21 and 22, 2025, and submitted for full Table 915-1 analysis: one from connection to the separator (FL01-R-S) and one from the wellhead connection (FL01-W-R). Laboratory results were compliant with applicable standards except for pH and arsenic. See the attached laboratory reports and tables for details.

Following removal of 1,694 feet of flowline, material in the flowline corridor was characterized on December 9, 2025. Eight soil samples were collected and field-screened at connections to the wellhead and separator and along the corridor. The connection point samples (FL01R-W and FL01R-S) and two samples from the corridor (FL01-01 and FL-01-05) were submitted for full Table 915-1 analysis. Laboratory results were compliant with applicable standards except for arsenic, barium, cadmium, hexavalent chromium, and lead. See Document 404491198 (In Process) for details.

The wellhead was cut and capped per ECMC rules on April 2, 2026. Accordingly, five samples were collected for field-screening from the base and sidewalls of the excavation. With noted odor and a PID reading exceeding 50 ppm in WH01, a spill report was submitted (Form 19 Document 404607572). The ECMC assigned Spill/Release ID 493727, approved the form and subsequent closure of the Spill/Release ID on to Remediation Project 39021 on April 3, 2026. The base sample (WH01) was collected from 4 feet bgs and submitted for full Table 915-1 analysis. Laboratory results confirmed the spill report with exceedances of 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, pH, and arsenic. See the attached laboratory reports and Report for details.

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):

Additional soil samples will be collected to delineate 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene exceedances identified in the wellhead investigation area (WH01). Soil samples will be submitted for full Table 915-1 analysis. Additional background samples will be collected to further establish the natural range of values for inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values in the investigation area are within the natural range of values, further delineation may be completed at the former wellhead and flowline to address elevated pH (FL01-S-R and WH01), cadmium (FL01-05), hexavalent chromium (FL01R-S), and lead (FL01-05). See the attached figure for proposed sampling locations.

Proposed Groundwater Sampling

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

No groundwater has been encountered during site investigation activities. If groundwater is encountered, a grab groundwater sample will be collected and submitted for full Table 915-1 analysis.

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):

Field personnel will field-screen all disturbance areas using visual and olfactory senses to determine if laboratory analysis is required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 1

-- Highest concentration of TPH (mg/kg) 345

Number of soil samples exceeding 915-1 1

-- Highest concentration of SAR 5.61

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

BTEX > 915-1 Yes

Approximate areal extent (square feet) 100

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?

Were background samples collected as part of this site investigation?

On May 21, 2025, three background samples were collected at depths ranging from 1 to 4 feet bgs and submitted for Table 915-1 inorganics (SSR and metal constituents). The maximum recorded background pH value is 8.16. The maximum calculated background concentrations, with a 1.25x multiplier applied for metals, are 2.6 mg/kg arsenic and 77.4 mg/kg barium.

On December 9, 2026, six background samples were collected and analyzed for Table 915-1 inorganics. These samples were discovered to have been collected in an area previously disturbed by oil and gas operations and as a result, are not considered representative of natural soil conditions and will be excluded from site compliance evaluations and future reporting.

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?

Additional soil samples will be collected to delineate 1,2,4-trimethylbenzene, 1,3,5-trimethylbenze, naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene exceedances identified in the wellhead investigation area (WH01). Soil samples will be submitted for full Table 915-1 analysis. Additional background samples will be collected to further establish the natural range of values for inorganic constituents in the project area.

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.

On April 3, 2026, approximately 20 cubic yards of impacted soil was excavated following cut and cap activities and transported to North Weld Landfill, a licensed disposal facility. Should additional source removal be warranted upon conclusion of investigation efforts, a removal summary will be provided.

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.

Site investigation and delineation efforts are still underway for this project. When investigation efforts have concluded, if remediation is deemed to be necessary, a remedial approach will be proposed, and subsequent efforts and results will be reported here.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) 20

_____ 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 efforts.

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 Quarterly Update, SSI Report, and SSIP

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.

PDC intends to directly address the costs of remediation at the locations as part of the asset retirement obligation process and operations. PDC has general liability insurance (policies MWZZ316714 and MWZX316724) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: \$ 50000

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:

NA

Volume of E&P Waste (solid) in cubic yards 20

E&P waste (solid) description Impacted E&P soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: North Weld Landfill

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.

Reclamation will be completed 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. 10/31/2026

Proposed date of completion of Reclamation. 10/31/2028

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. 01/14/2025

Actual Spill or Release date, or date of discovery. 04/02/2026

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/21/2025

Proposed site investigation commencement. 05/21/2025

Proposed completion of site investigation. 09/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/30/2026

Proposed date of completion of Remediation. 03/31/2027

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 adjusted to reflect the status of site investigation efforts and anticipated dates for completion. Additional site investigation to delineate 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene exceedances at the wellhead and to further characterize background soil conditions are tentatively scheduled to be completed at the end of the third quarter of 2026, and results will be reported in a subsequent Form 27.

OPERATOR COMMENT

This form has been submitted to satisfy the quarterly reporting requirements for the FRANK #6LL Remediation Project (REM 39021), report results of the April 2, 2026, wellhead cut and cap site investigation, review overall project status, and to propose additional site investigation.

The wellhead was cut and capped per ECMC rules on April 2, 2026. Accordingly, five samples were collected for field-screening from the base and sidewalls of the wellhead excavation. With a noted odor and a PID reading exceeding 50 ppm in WH01, a spill report was submitted (Form 19 Document 404607572). The ECMC assigned Spill/Release ID 493727, approved the form and subsequent closure of the Spill/Release ID on to Remediation Project 39021 on April 3, 2026. The base sample (WH01) was collected from 4 feet bgs and submitted for full Table 915-1 analysis. Laboratory results confirmed the spill report with exceedances of 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, pH, and arsenic. See the attached laboratory reports and Report for details.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The proposed supplemental site investigation is tentatively scheduled to be completed by the end of the third quarter of 2026 in accordance with the proposed implementation schedule and figure attached to this form submittal. Results will be submitted in 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: Miranda Beard

Title: Program Scientist

Submit Date: _____

Email: CVX-REMS@confluence-cc.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: 39021

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**

404638638	SITE INVESTIGATION REPORT
404638640	LABORATORY ANALYTICAL REPORT
404638643	LABORATORY ANALYTICAL REPORT

Total Attach: 3 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)