

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404666495
Receive Date:
05/20/2026

Report taken by:
Rick Allison

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 #: 43883 Initial Form 27 Document #: 404476371

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>123-12741</u>	County Name: <u>WELD</u>
Facility Name: <u>KOEHLER 1</u>	Latitude: <u>40.469580</u>	Longitude: <u>-104.646890</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>22</u>	Twp: <u>6N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-13241</u>	County Name: <u>WELD</u>
Facility Name: <u>KOEHLER 2</u>	Latitude: <u>40.466110</u>	Longitude: <u>-104.647280</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>22</u>	Twp: <u>6N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: LOCATION Facility ID: 472131 API #: County Name: WELD
 Facility Name: Koehler 1, 2 Latitude: 40.466680 Longitude: -104.646689
 ** correct Lat/Long if needed: Latitude: Longitude:
 QtrQtr: SWSE Sec: 22 Twp: 6N Range: 65W 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 0.02mi E
 Residential 0.11/0.14mi S, 0.18mi SE, 0.19/0.21mi SW
 Farm Structure 0.08/0.14/0.15/0.17mi S, 0.22/0.24mi SE, 0.17/0.21/0.24mi SW

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	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 Koehler 2 wellhead cut and cap and flowline removal. The entirety of the flowline was removed during decommissioning activities. Soil samples were collected beneath the flowline risers at the wellhead and separator. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead and at least every 250 feet along the flowline.

Pursuant to ECMC Rule 911 a site investigation will be conducted pertaining to the Koehler 1 wellhead cut and cap and flowline removal. Approximately 959' of flowline will be removed. The ECMC will be updated in a supplemental Form 27 if a portion of the flowline is abandoned-in-place due to field constraints. The wellhead will be cut and capped per ECMC rules. Additionally, soil samples will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be 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. The Flowline Pre-Abandonment Notice Document number is Form 44 Document Number 404634545.

A site investigation will be conducted pursuant to ECMC Rule 911 at the Koehler 1, 2 Facility and Tank Battery location.

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 and will be 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 and will be field screened at the N-E-S-W sides of the wellhead. Soil samples will be 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. Grab confirmation soil samples will be collected from the produced water vessel excavation, beneath the ground oil tank, and at the risers for the flowline and dumpline of any separator. Soil samples were and will be 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.

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 will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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 Koehler 1 wellhead, flowline, and tank battery areas will occur during abandonment activities. Field personnel will field screen all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required. The ECMC Flowline Closure and Wellhead Closure and Tank Battery Closure Checklists will be utilized and filled out during the abandonment process. A photolog will be submitted on the Subsequent Form 27.

A detailed summary of Koehler 2 flowline and wellhead decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to Form 27 Document Number 404605696.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
 Number of soil samples exceeding 915-1 3
 Was the areal and vertical extent of soil contamination delineated? No
 Approximate areal extent (square feet) 300

NA / ND

-- Highest concentration of TPH (mg/kg) 341
 -- Highest concentration of SAR 2.28
 BTEX > 915-1 No
 Vertical Extent > 915-1 (in feet) 4

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
 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 February 23, 2026, three background soil samples were collected from three discrete locations (BKG01-BKG03) by a third party Chevron business partner. On February 27, 2026, six background soil samples were collected from two discrete locations (BKG01-BKG02). Background soil samples were collected from depths ranging between 3.5 to 5 feet below ground surface (ft bgs) and analyzed for metals in soil per ECMC Table 915-1, pH, EC, SAR, and boron. The maximum background concentration with a 1.25x multiplier applied for arsenic, barium, chromium, lead, and selenium were calculated to be 16.1 mg/kg, 1200 mg/kg, 0.51 mg/kg, 10.5 mg/kg, and 0.24 mg/kg, respectively. Concentrations of lead and/or selenium remain in exceedance of ECMC standards and above background concentrations in soil sample locations WH01@4', FL01-W-R@3.5', and FL01R-S@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?

Based on the analytical results collected during flowline and wellhead decommissioning activities, a supplemental site investigation (SSI) will be completed to collect an additional five background soil samples to assess native soil conditions on site. Concurrently, soil borings will be advanced in order to vertically and horizontally delineate the elevated lead concentrations observed in soil samples WH01@4' and FL01-W-R@3.5'. Background soil samples will be submitted for analysis of pH, EC, SAR, boron, and metals in soil per ECMC Table 915-1. Confirmation soil samples will be submitted for analysis of the full Table 915-1 Suite. The proposed soil boring locations are illustrated on Figures 4 and 5 attached to Document Number 404605696. The SSI will be completed in accordance with the implementation schedule, and 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.

No impacted material caused by oil and gas operations was identified at this time.

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.

Flowline and wellhead decommissioning analytical results indicated that organic compound concentrations were in compliance with ECMC regulatory standards in all soil sample locations. Concentrations of lead and/or selenium remain in exceedance of ECMC standards and above background concentrations in soil sample locations WH01@4', FL01-W-R@3.5', and FL01R-S@4'.

Based on the analytical results collected during flowline and wellhead decommissioning activities, a supplemental site investigation (SSI) will be completed to collect an additional five background soil samples to assess native soil conditions on site. Concurrently, soil borings will be advanced in order to vertically and horizontally delineate the elevated lead concentrations observed in soil samples WH01@4' and FL01-W-R@3.5'. Background soil samples will be submitted for analysis of pH, EC, SAR, boron, and metals in soil per ECMC Table 915-1. Confirmation soil samples will be submitted for analysis of the full Table 915-1 Suite. The proposed soil boring locations are illustrated on Figures 4 and 5 attached to Document Number 404605696. The SSI will be completed in accordance with the implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

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 flowline or wellhead 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 Scope of Work 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.

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 site investigation activities are 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: \$ 1500

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? _____

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 reseeded 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. 02/23/2026

Proposed date of completion of Reclamation. 05/24/2028

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. 01/09/2026

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/23/2026

Proposed site investigation commencement. 11/09/2026

Proposed completion of site investigation. 11/09/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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 change due to the decommissioning of the Koehler 2 wellhead and flowline and necessity for supplemental site investigation activities adjacent to the wellhead and flowline. The proposed site investigation is tentatively scheduled to commence on November 9, 2026.

OPERATOR COMMENT

This Supplemental Form 27 is being submitted as an scope of work update for the Koehler 2 wellhead and associated flowline (REM 43883). The scope of work has been updated to include the wellhead cut and cap and flowline removal for Koehler 1 and the facility decommissioning for the Koehler 1,2 facility. An updated site map with proposed soil sample locations will be submitted on the next supplemental form 27 with analytical updates.

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: 05/20/2026

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: Rick Allison

Date: 05/22/2026

Remediation Project Number: 43883

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

404666495	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

Environmental	ECMC has processed this form as an update without technical review; no data was attached thus approval of this form does not imply any agreement with comments on completion of site investigation or alteration of site plan. All ongoing/unaddressed comments/COAs from previous Forms remain applicable. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and may request expedited review if necessary.	05/22/2026
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Total: 1 comment(s)