

October 29, 2021

**Re: Remedial Action Plan  
Highpoint Operating Corporation  
Crittter Creek 9-15H (Production Tank Overflow)  
Form 27 Document # 401841711  
COGCC Remediation # 12261  
Facility ID # 456514  
SESE Sec 15-T11N-R63W  
Weld County, Colorado**

## **INITIAL ACTION SUMMARY**

On October 23, 2018, an initial round of soil sampling was conducted immediately following the release. Four soil samples (SS01 through SS04) were collected throughout the release area from depths ranging from 0-12" bgs. The samples were submitted for analysis of GRO, DRO, and BTEX. SS03 was also submitted for pH, EC, and SAR. Laboratory analytical results indicated soil samples SS02 and SS03 exceeded the Table 910-1 standard for TPH. All other results were compliant with applicable standards. The Operator applied a biological soil amendment (Micro-Blaze) to accelerate attenuation of the affected area.

On November 12, 2018, additional soil sampling was conducted at locations SS02 and SS03 for analysis of GRO, DRO, and BTEX at depths ranging from 6-9" bgs. Laboratory analytical results indicated that sample SS02 was compliant with Table 910-1 standards, but sample SS03 still exceeded the Table 910-1 standard for TPH.

On May 6, 2019, seven locations (Loc. 3, Loc. 5 – 10) were hand augured inside the former spill area. Two soil samples were collected from each of the seven locations: one from 0-6" bgs, and one from 18-24" bgs. All 14 samples were submitted for analysis of GRO, DRO, BTEX, pH, EC, and SAR. Three additional locations off the pad (BG01-BG03) were also hand augured for background comparisons. Two soil samples were collected from each of the background locations: one from 0-6" bgs, and one from 18-24" bgs. All 6 background samples were submitted for analysis of pH. Laboratory analytical results indicated that Loc. 3, 5, 6, and 10 exceeded the Table 910-1 standard for TPH at the 0-6" bgs interval. Loc. 8 exceeded the Table 910-1 standard for TPH at the 18-24" bgs interval. Loc. 8 exceeded the Table 910-1 standard for pH at the 0-6" bgs interval. All other results were compliant with applicable standards.

On October 20, 2020, seven soil samples were collected from various intervals at the seven locations where TPH exceedances have been previously identified (Loc. 2, 3, 5, 6, 8, and 10). All seven samples were submitted for analysis of GRO, DRO and ORO. One additional sample was collected from Loc.8 (where a previous exceedance of pH was identified), and submitted for analysis of pH. Laboratory analytical results indicated Loc. 3 and 10 exceeded the Table 910-1 standard for TPH at the 0-6" bgs interval. Loc. 3 and 8 exceed the Table 910-1 standard for TPH at the 6-12" bgs and 18-24" bgs intervals, respectively. All other results were compliant with applicable standards.

On October 5, 2021, five samples were collected from various depths at the three locations where TPH exceedances have been previously identified (Loc. 3, 8, and 10). All five samples were submitted for analysis of GRO, DRO, ORO, and BTEX. Laboratory analytical results

indicated Loc. 8 still exceeds the Table 915-1 standard for TPH at both the 0-6” bgs and 18-24” bgs intervals, and Loc. 10 still exceeds the Table 915-1 standard for TPH at both the 0-6” bgs interval. All other results were compliant with applicable standards.

Soil sample locations are depicted on the attached Figure. Soil sample analytical results are summarized on the attached Table. The laboratory report for the October 5, 2021 sampling event is attached. Photo-documentation from the sampling event is also attached.

### **SURCE REMOVAL SUMMARY and REMEDIATION SUMMARY**

The Operator plans to remove the tanks from inside the berm and excavate the remaining impacted soil.

### **PROPOSED SAMPLING PLAN**

Following the tank removal and soil excavation, confirmation soil samples will be collected from the sidewalls and floor of the excavation. The confirmation soil samples will be submitted for analysis of DRO, GRO, and ORO. An updated eform 27 will be submitted on or before January 31, 2022.