

**State of Colorado**  
**Energy & Carbon Management Commission**

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Document Number:  
404162468

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 ECOM 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>QB ENERGY OPERATING LLC</u>	Operator No: <u>10844</u>	<b>Phone Numbers</b>
Address: <u>1001 17TH STREET SUITE 1600</u>		Phone: <u>(720) 830-7549</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>(720) 830-7549</u>
Contact Person: <u>Derek Horn</u>	Email: <u>dhorn@qb-energy.com</u>	

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 38087 Initial Form 27 Document #: 403929237

**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**

No Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>487672</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>8" D23A Lateral</u>	Latitude: <u>39.606880</u>	Longitude: <u>-108.143140</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>23</u>	Twps: <u>5S</u>	Range: <u>96W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

**SITE CONDITIONS**

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Non-crop land

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**

West Fork of Parachute Creek is located approximately 235 feet west.

**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
Yes	SOILS	To be determined	Soil sampling 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.

On August 21, 2024, liquid was observed surfacing from a buried pipeline approximately 315 feet north of the D23A well pad. An unknown volume of condensate and produced water was released from the line. The release was reported via Energy & Carbon Management Commission (ECMC) Form 19 Document 403896466 to open Spill/Release Point ID 487672.

**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 ):

Based on recent assessment data, organic exceedances appear to be delineated. Additional soil samples will be collected as needed to characterize the extent of inorganics associated with the release. Prior to sampling, QB requests a reduced analyte suite of total petroleum hydrocarbons (TPH), benzene, ethylbenzene, xylenes, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, electrical conductivity (EC), sodium adsorption ratio (SAR), pH and boron for all future investigation. See the attached Report of Work Completed (ROWC) for additional details.

**Proposed Groundwater Sampling**

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

Groundwater has not been encountered during assessment to date. If groundwater is encountered during additional site investigation activities, QB Energy will attempt to collect a sample for characterization.

**Proposed Surface Water Sampling**

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

[Empty text box for surface water sampling details]

**Additional Investigative Actions**

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

[Empty text box for additional investigative actions]

**SITE INVESTIGATION REPORT**

## **SAMPLE SUMMARY**

### **Soil**

Number of soil samples collected 18

Number of soil samples exceeding 915-1 18

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

Approximate areal extent (square feet) 360

### **NA / ND**

-- Highest concentration of TPH (mg/kg) 7567

-- Highest concentration of SAR 51.98

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 37

### **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?

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?

See the Proposed Sampling section and the attached ROWC.

## **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.

QB Energy is in the process of determining the extent of impacts associated with the project. Once impacts are delineated, QB Energy will prepare a remediation plan to remove the source material within the release area.

### **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.

On August 28, 2024, initial sampling activities were conducted to characterize soil impacts at the point of release (POR). The POR was identified and the damaged section of pipeline was removed. The excavation extent around the POR measured approximately 30 feet by 14 feet and extended to 6.5 feet below ground surface (bgs). One soil sample was collected at the base of the excavation, directly below the POR and submitted for analysis of Table 915-1 soil constituents of concern. Analytical results of the POR sample exceed Table 915-1 Residential Soil Screening Levels (RSSLs) for TPH, benzene, ethylbenzenes, xylene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, SAR, boron, and arsenic.

On October 22 and 23, 2024, five soil borings (SB01-SB05) were advanced using an environmental drill rig. Soil samples were screened every 5 feet, with three to four samples collected from each boring, depending on the depth at which bedrock was encountered. In total, 17 soil samples were collected and analyzed. Analytical results exceed Table 915-1 RSSLs for TPH, xylenes, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, EC, SAR, pH, boron, and arsenic. Organic exceedances appear to be fully delineated while inorganics remain undelineated. See the attached ROWC for additional details.

**Soil Remediation Summary**

In Situ

Ex Situ

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

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

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

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 101

\_\_\_\_\_ 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.

# 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 Change of Operator

## 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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, QB Energy has general liability insurance in the amount of \$5M, and QB Energy has umbrella insurance, which sits over the general liability insurance in the amount of \$65M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$70M.

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

## 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                      101

E&P waste (solid) description                      Impacted soil

ECMC Disposal Facility ID #, if applicable:                     

Non-ECMC Disposal Facility:                      Greenleaf Environmental Services, LLC

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.

QB Energy will reclaim all impacted areas to the previously existing conditions and will include these areas in QB Energy's Pipeline Reclamation and Monitoring program. All reclamation will be completed in accordance with 1000 Series Regulations

Is the described reclamation complete? No \_\_\_\_\_

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. \_\_\_\_\_

Proposed date of completion of Reclamation. \_\_\_\_\_

## 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. 08/21/2024

Actual Spill or Release date, or date of discovery. 08/21/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/28/2024

Proposed site investigation commencement. 08/28/2024

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/28/2024

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:

**OPERATOR COMMENT**

This form is being submitted to request change of operator from #10456 to #10844.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Derek Horn

Title: EHS Specialist

Submit Date: \_\_\_\_\_

Email: dhorn@qb-energy.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: 38087

**COA Type****Description**

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**

Att Doc Num	Name

Total Attach: 0 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)