

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
John Heil

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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers Phone: (970) 778-2314 Mobile: (970) 778-2314
Address: 1001 17TH STREET #1600		
City: DENVER	State: CO	Zip: 80202
Contact Person: Jake Janicek	Email: jjanicek@qb-energy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25302 Initial Form 27 Document #: 403112417

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: Q4 2024 Status Update to Remediation Project Number (RPN) 25302

SITE INFORMATION

Yes Multiple Facilities

Facility Type: PIT	Facility ID: 104876	API #: _____	County Name: RIO BLANCO
Facility Name: SAGEBRUSH HILLS 4504	Latitude: 39.896750	Longitude: -108.530633	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 8	Twp: 2S	Range: 99W Meridian: 6 Sensitive Area? No
Facility Type: WELL	Facility ID: _____	API #: 103-07527	County Name: RIO BLANCO
Facility Name: SAGEBRUSH HILLS II UNIT A 4504	Latitude: 39.896976	Longitude: -108.530441	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 8	Twp: 2S	Range: 99W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION Facility ID: 314907 API #: County Name: RIO BLANCO
Facility Name: SAGEBRUSH HILLS II UNIT A- Latitude: 39.896740 Longitude: -108.530613
62S99W 8NENW
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NENW Sec: 8 Twp: 2S Range: 99W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Rangeland-BLM

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

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	TBD	Site Investigation/Laboratory Analytical

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Please see documents associated with ECMC Remediation # 25302 for a list of activities completed prior to the fourth quarter of 2024.

Between October 7 and 16, 2024, excavation and source removal activities were conducted to further remove and delineate previously identified soil exceedances of ECMC Table 915-1 below former production equipment and the historic pit [Document Numbers (DNs) 403198591, 403269743, 403251695, and 403597932]. The investigative subsurface activities were completed with support of excavation equipment and a decontaminated hand spade shovel. A total of seven excavations were advanced to depths ranging from 6.5 to 20 feet below ground surface (bgs).

A total of 39 excavation confirmation samples and 8 five-point composite stockpile samples were collected between October 7 and 16, 2024. All confirmation soil samples and five-point composite stockpile samples were field screened, which included characterization of the soils and screening the soil headspaces using a handheld photoionization detector (PID) to monitor the presence or absence of volatile organic compounds (VOCs). All samples were submitted for laboratory analysis of the previously approved reduced suite (ECMC DN 403198591) of total petroleum hydrocarbons (TPH), chromium (VI), hot water-soluble boron, electrical conductivity (EC), and sodium adsorption ratio (SAR).

Please reference the attached Report of Work Completed (ROWC) for additional 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):

Please see the Remediation Summary Section of this form for this information.

Proposed Groundwater Sampling

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

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):

Please see the "Remediation Summary" sections of this form for additional planned investigation activities, along with the attached Report of Work Completed (ROWC).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 47

Number of soil samples exceeding 915-1 44

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

Approximate areal extent (square feet) 85068

NA / ND

-- Highest concentration of TPH (mg/kg) 250.8
781

-- Highest concentration of SAR 31.4

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 20

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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?

See Document Numbers 403112417 and 403198591 for references to previously collected site-specific background and boring soil samples.

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?

Please see the "Proposed Soil Sampling" and "Remediation Summary" sections of this form for additional planned investigation activities, along with the attached Report of Work Completed (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.

The impacts are considered historical so a source cannot be identified.

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.

QB will continue to focus on source removal of shallow chromium (VI) exceedances greater than 1.0 mg/kg throughout the Site. QB will address remaining inorganic exceedances under ECMC Rule 915.b once all shallow excavations are completed. Expansion of six of the seven excavations and proposed excavation, sidewall, stockpile, and confirmation sampling is described in the attached Report of Work Completed (ROWC).

Caerus requests that all future soil samples associated with this project be evaluated only for those analytes (EC, SAR, hexavalent chromium) that soil samples collected in October of 2024 exhibited exceedances for. All other Constituents of Concern have been addressed via remediation through mechanical removal.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ 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 Q4 2024 Status Update to RPN 25302

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 Q4 2024 Status Report

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: \$ 200000

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:

None

Volume of E&P Waste (solid) in cubic yards 312

E&P waste (solid) description Soil impacted by E&P waste

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Wray Gulch Landfill, Rio Blanco County

Volume of E&P Waste (liquid) in barrels 11

E&P waste (liquid) description Hydro-vac rinsate mixed with impacted soils

ECMC Disposal Facility ID #, if applicable: 426582

Non-ECMC Disposal Facility: Greenleaf Environmental Services

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.

All disturbances within the interim reclaim will be reclaimed to match existing grade. When the site is decommissioned at a later date, it will be reclaimed in accordance with 1000 Series regulation.

Is the described reclamation complete? _____

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. _____

Actual Spill or Release date, or date of discovery. 06/24/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/24/2022

Proposed site investigation commencement. 04/01/2025

Proposed completion of site investigation. 08/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/07/2024

Proposed date of completion of Remediation. 10/15/2025

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

Please see the attached Report of Work Completed (ROWC) for a detailed description of the planned expansion of six of the seven excavations to address shallow chromium (IV) exceedances greater than 1.0 mg/kg.

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

Signed: Jake Janicek

Title: EHS Specialist

Submit Date: 04/21/2025

Email: jjanicek@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: John Heil

Date: 06/11/2025

Remediation Project Number: 25302

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**

404040022	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404075719	REMEDATION PROGRESS REPORT
404172666	ANALYTICAL RESULTS
404172668	ANALYTICAL RESULTS
404172669	ANALYTICAL RESULTS
404172672	ANALYTICAL RESULTS
404172678	ANALYTICAL RESULTS
404172681	ANALYTICAL RESULTS
404172682	ANALYTICAL RESULTS
404172683	ANALYTICAL RESULTS
404172686	ANALYTICAL RESULTS
404237067	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 12 Files

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

Environmental	ECMC approves the attached REMEDIATION PROGRESS REPORT Doc #404075719.	04/16/2025
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Total: 1 comment(s)