

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 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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers Phone: (720) 830-7549 Mobile: (720) 830-7549
Address: 1001 17TH STREET #1600		
City: DENVER	State: CO	Zip: 80202
Contact Person: Derek Horn	Email: dhorn@qb-energy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21016 Initial Form 27 Document #: 402857325

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: Quarterly Status Update to Remediation Project Number (RPN) 21016

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 480346	API #: _____	County Name: GARFIELD
Facility Name: PJ 16 Dumpline Leak	Latitude: 39.434772	Longitude: -108.001368	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSE	Sec: 16	Twps: 7S	Range: 95W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	20-39 ft below grade	Excavation, soil borings, lab 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.

Please see documents associated with ECMC RPN 21016 and Form 27 supplemental DN 404040206 for the comprehensive details of work performed in 2024.

As of February 27th, 2025, HRL personnel had mobilized to the Site on two (2) occasions in Q1 of 2025 to complete operations and maintenance (O&M) activities on the Soil Vapor Extraction (SVE) system. SVE parameters, photoionization (PID) readings, and effluent emissions samples were collected during each site visit to determine the volume of hydrocarbons removed. Vapor samples were submitted to Pace Analytical Laboratory for analyses using EPA Method M18-MOD. Please see the attached files for sampling dates, summaries, system performance tables, and lab analytical data.

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):

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 915-1

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 400

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet) 39

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?

Background samples were collected from undisturbed, native soil adjacent to the pad location.

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?

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 source was a failed dumpline which was replaced with upgraded material. SVE system is in place to routinely operate. Regular maintenance and routine system checks implemented.

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.

To date, 488 cubic yards of impacted material excavated from grade to 20 ft below ground surface has been transported to Greenleaf Environmental Services for offsite disposal. Manifests will be supplied upon request.

On 5/26/2022, a battery operated (charged via solar panels) soil vapor extraction blower was plumbed into a two inch well identified by SVE-01 advanced through the impacted area directly beneath the point of release and activated.

As of December 2024, routine O&M checks in place to allow changes to be made to best suite the sites specific needs.

As of February 27th, 2025, monthly O&M visits have been completed for Q1 2025. Monthly monitoring will continue, and vapor samples will be collected on a monthly basis until air emission trends, or a decline in air emissions is observed. Please see the attached field summaries, performance table, and lab analytical data for the vapor samples collected on January 30, 2025, and February 27, 2025.

Soil Remediation Summary

<input checked="" type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	Yes _____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) _____ 578
Yes _____ 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 Q1 2025 SVE remediation 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.

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:

Volume of E&P Waste (solid) in cubic yards 578

E&P waste (solid) description Impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Greenleaf Environmental Services

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.

There are currently no plans for reclamation, as the well pad still remains active.

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. 07/28/2021

Actual Spill or Release date, or date of discovery. 07/28/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/28/2021

Proposed site investigation commencement. 07/28/2021

Proposed completion of site investigation. 03/24/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/28/2021

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 as a Q1 2025 update for RPN 21016. Field summaries and analytical data has been included for work completed during this period. Per ECMC Rule 913.e, a semi-annual reporting schedule is requested.

This form was originally submitted on 03/13/2025. Following the data integrity NTO issued on 04/08/2025, this form was returned to draft on 04/28/2025, and is now being resubmitted on 05/01/2025 with secured laboratory reports included.

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: 05/01/2025

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: John Heil

Date: 06/11/2025

Remediation Project Number: 21016

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
404122704	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404126837	MONITORING REPORT
404126849	MONITORING REPORT
404185891	LABORATORY ANALYTICAL REPORT
404186639	LABORATORY ANALYTICAL REPORT
404237545	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 6 Files

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

User Group	Comment	Comment Date
Environmental	ECMC has returned this form to Draft (RTD) due to the laboratory report not being secured.	04/28/2025

Total: 1 comment(s)