FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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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 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 INFORMATON

Name of Operator: QB ENERGY OPERATING LLC Operator No: 10844
Address: 1001 17TH STREET SUITE 1600
City: DENVER State: CO Zip: 80202
Contact Person: Blair Rollins Email: brollins@qb-energy.com

Phone Numbers
Phone: (970) 640-6919
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 23856 Initial Form 27 Document #: 403056775

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.
- [X] 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: SPILL OR RELEASE Facility ID: 481668 API #: County Name: GARFIELD
Facility Name: P26W Spill Latitude: 39.410515 Longitude: -107.734642
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESE Sec: 26 Twp: 7S Range: 93W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications GC
Most Sensitive Adjacent Land Use Non-cropland rangeland
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

NA

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [ ] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	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 February 21, 2022, an unknown volume of comingled fluid was released into the lined secondary containment due to a valve failure during transport truck offloading operations. The release was reported via Energy & Carbon Management Commission (ECMC) Form 19 Document 402963034 to open Spill/Release Point ID 481668. Form 27 Document 403056775 was later submitted to open Remediation Project 23856 and close Spill/Release Point 481668. On June 20, 2024, an initial site investigation was completed to determine if impacts from the release were present within the soil beneath the liner. Three potholes were advanced at an angle on the southeast corner of the tank battery containment to depths of 4 to 5 feet below ground surface (bgs). Hand tools were used to collect soil from the terminus of each pothole beneath the tank containment liner and one soil sample was collected from each pothole. Analytical results of the soil samples indicate compliance with Table 915-1 Residential Soil Screening Levels (RSSL) except for total petroleum hydrocarbons (TPH), sodium adsorption ratio (SAR), pH, and arsenic.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

On May 23, 2025, the tanks, containment, and liner was removed, and an excavation measuring approximately 25 feet by 25 feet to a depth of 12.5 feet bgs was completed. Five soil samples were collected from the excavation, including one sample from each sidewall and one from the base. The samples were submitted to Elevation Diagnostics for analysis for the approved reduced analyte suite of TPH, SAR, pH, arsenic, and hexavalent chromium. Excavated soil was field screened using a photoionization detector (PID) and stockpiled onsite for additional characterization. As of the date of this submittal, analytical results remain pending. Upon receipt of the data, QB will evaluate the results to determine appropriate next steps and will present any proposed remedial actions or strategies in the next supplemental Form 27 submittal to the ECMC.

Proposed Groundwater Sampling

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

Groundwater is not anticipated to be encountered. If groundwater is encountered during site investigation, QB 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):

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 exceeeding 915-1:

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

Approximate areal extent (square feet): 700

NA / ND

Highest concentration of TPH (mg/kg):

Highest concentration of SAR:

BTEX > 915-1:

Vertical Extent > 915-1 (in feet):

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 June 10, 2025, four soil samples were collected from depths of 2.5 to 3 feet below ground surface (bgs) to establish native soil conditions. QB will evaluate the analytical results upon receipt and submit the findings in a supplemental Form 27.

☐ 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 Proposed Soil Sampling.

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.

On May 23, 2025, the tanks, containment, and liner was removed, and an excavation measuring 25 feet by 25 feet to a depth of 12.5 feet bgs was completed. Five soil samples were collected from the excavation, including one sample from each sidewall and one from the base. Excavated soils were field screened using a PID and stockpiled onsite for further characterization. QB will evaluate the pending analytical results upon receipt prior to determining and implementing any additional remedial actions or strategies. The results and any proposed actions will be submitted to the ECMC in a supplemental Form 27.

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.

On June 20, 2024, initial sampling was conducted to evaluate potential impacts beneath the liner at the southeast corner of the tank battery containment. Three angled potholes were advanced to depths of 4 to 5 feet bgs, with one soil sample collected from each. Analytical results indicated compliance with Table 915-1 RSSLs except for TPH, SAR, pH, and arsenic. Based on these results, Form 27 Document 403850138 was submitted on July 18, 2024, requesting RSSL comparison and a reduced analyte suite of TPH, SAR, pH, arsenic, and hexavalent chromium, which was approved on August 7, 2024. On October 17, 2024, vertical delineation sampling was completed north of SB01-SB03. One surface sample and one sample from 9 feet bgs were collected using hand tools and a hand auger. Analytical results indicated compliance with RSSLs except for SAR, pH, and arsenic. Details are provided in the ROWC associated with Form 27 Document 403996550.

On May 23, 2025, the tanks, containment, and liner was removed, and an excavation measuring 25 feet by 25 feet to 12.5 feet bgs was completed. Five soil samples were collected from the base and each sidewall. Excavated soils were field screened using a PID and stockpiled for further characterization. QB will evaluate pending analytical results upon receipt to determine any additional remedial actions and present findings in a supplemental Form 27.

Soil Remediation Summary

☐ **In Situ**

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

☒ **Ex Situ**

- No — Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) ____
  - Name of Licensed Disposal Facility or ECMC Facility ID # ____
- Yes — Excavate and onsite remediation
  - No — Land Treatment
  - No — Bioremediation (or enhanced bioremediation)
  - No — Chemical oxidation
  - Yes — Other: Onsite staging and assessment

Groundwater Remediation Summary

- No — Bioremediation (or enhanced bioremediation)
- No — Chemical oxidation
- No — Air sparge / Soil vapor extraction
- No — Natural Attenuation
- No — 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 is not anticipated to be encountered. If groundwater is encountered during site investigation, QB will attempt to collect a sample for characterization.

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 2025 Q1 Q2 Semi-Annual status 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: $ 25000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

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 reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The spill occurred within the secondary containment on the active working surface of the pad. Any disturbance will be returned to the active working surface of the well pad for continued operation. When the site is decommissioned at a later date, it will be reclaimed 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. 02/21/2022

Actual Spill or Release date, or date of discovery. 02/21/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/20/2024

Proposed site investigation commencement. 06/20/2024

Proposed completion of site investigation. 08/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/01/2025

Proposed date of completion of Remediation. 12/31/2025

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

This Form 27 is being submitted to provide the ECMC with a 2025 Q1 Q2 semi-annual update for Remediation Project 23856. On May 23, 2025, the tanks, containment, and liner was removed, and an excavation measuring approximately 25 feet by 25 feet to a depth of 12.5 feet bgs was completed. Five soil samples were collected from the excavation, including one sample from each sidewall and one from the base. The samples were submitted to Elevation Diagnostics for analysis for the approved reduced analyte suite of TPH, SAR, pH, arsenic, and hexavalent chromium. Excavated soil was field screened using a PID and stockpiled onsite for additional characterization. As of the date of this submittal, analytical results remain pending. Upon receipt of the data, QB will evaluate the results to determine appropriate next steps and will present any proposed remedial actions or strategies in the next supplemental Form 27 submittal to the ECMC.

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

Signed: Blair Rollins Title: Environmental Specialist

Submit Date: Email: brollins@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: 23856

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

Total Attach: 0 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)