

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
404256925
Receive Date:
06/27/2025

Report taken by:
Nick Cholas

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: <u>QB ENERGY OPERATING LLC</u>	Operator No: <u>10844</u>	Phone Numbers Phone: <u>(970) 902-3598</u> Mobile: <u>(970) 902-3598</u>
Address: <u>1001 17TH STREET SUITE 1600</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Andy Verbonitz</u>	Email: <u>averbonitz@qb-energy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34380 Initial Form 27 Document #: 403709318

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: 2Q 2025 Status Update to Remediation Project Number (RPN) 34380

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>GAS COMPRESSOR STATION</u>	Facility ID: <u>419752</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>BULL FORK COMPRESSOR STATION</u>	Latitude: <u>39.695594</u>	Longitude: <u>-108.283333</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>4S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485683</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>Bullfork Tank Bullplug Freeze</u>	Latitude: <u>39.696385</u>	Longitude: <u>-108.282971</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>4S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use East Willow
Creek, located
approximately
200' west of
location

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

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 checked="" 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	GROUNDWATER	TBD	Laboratory Analytical
Yes	SOILS	TBD	Laboratory Analytical
No	SURFACE WATER	NA	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 reference the ECMC Form 19 for Spill/Release Point ID Number 48563 document number (DN) 403620883 for emergency response measures taken. Reference Remediation Number 34380 for initial liner integrity inspection and initial characterization details provided via initial Form 27 DN 403709318.

Between June 9 and 13, 2025 a total of six monitoring wells and two soil borings were installed at the Site at depths ranging from 42 to 59 ft below ground surface (bgs) to further delineate (laterally and vertically) previously documented ECMC Table 915-1 soil and groundwater exceedances in the subsurface. A total of twenty-three confirmation soil samples and six groundwater samples were collected and submitted for full Table 915-1 laboratory analysis.

Please see the attached report of work completed (ROWC) for an in-depth summary of the monitoring well installation and soil borings completed between June 9 and 13, 2025.

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):

QB is currently waiting for soil analytical results to be returned from the laboratory following the samples collected during the installation of the monitoring wells and soil borings. Once analytical results are acquired, if further delineation is necessary, a plan will be presented in the subsequent quarterly form.

Proposed Groundwater Sampling

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

QB is currently waiting for groundwater analytical results to be returned from the laboratory following development and initial sampling of the monitoring wells. Once analytical results are acquired, if further delineation is necessary, a plan will be presented in the subsequent quarterly form.

Proposed Surface Water Sampling

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

Surface water samples will be collected during the next spring runoff event if flow is present as a precautionary measure.

Additional Investigative Actions

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

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

NA Highest concentration of TPH (mg/kg) _____
NA Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 0
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Benzene (µg/l) _____
NA Highest concentration of Toluene (µg/l) _____
NA Highest concentration of Ethylbenzene (µg/l) _____
NA Highest concentration of Xylene (µg/l) _____
NA Highest concentration of Methane (mg/l) _____

Surface Water

3 Number of surface water samples collected
0 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?

Please see ECMC DN 403864739 for information regarding the previously collected site-specific background samples.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 0 Volume of liquid waste (barrels) 6

Is further site investigation required?

QB is currently awaiting analysis results for soil samples collected during groundwater monitoring well installation. The wells will be sampled on a quarterly basis going forward and the next sampling event is planned for September 2025. Additional subsurface assessment and well installations may be required to further delineate impacts at the Site, pending laboratory analytical results.

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.

Approximately 6 bbls of release liquid was vacuumed up from the containment prior to it freezing.

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.

Once impacts have confirmed to be delineated, a remediation plan will be determined.

Soil Remediation Summary

In Situ

Ex Situ

Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ 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.

Six monitoring wells were installed between June 9 through 12, 2025 at locations upgradient, cross-gradient, and downgradient, as well as in the center of previously documented ECMC Table 915-1 soil and groundwater exceedances. QB is awaiting analytical results of the soil samples collected during well drilling and after monitoring well installation and development, which will be reported in a subsequent Supplemental Form 27.
Please see attached ROWC and Site Investigation Report tab for additional information.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other Q2 2025 update of RPN 34380

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 _____

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: \$ 100000

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 0

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels 6

E&P waste (liquid) description Hydro-vac rinseate mixed with impacted water

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Greenleaf Environmental

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.

If intrusive assessment or remediation is required, any disturbed areas will be reclaimed in accordance with 1000 series rules if offsite, or returned to active pad working surface if onsite.

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. 12/10/2023

Actual Spill or Release date, or date of discovery. 12/10/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/10/2023

Proposed site investigation commencement. 05/29/2024

Proposed completion of site investigation. 12/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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 report is being submitted as a Second Quarter 2025 update report to comply with Rule 913.e. Delineation soil and groundwater samples were collected in Q2 and are pending analytical and/or data evaluation/interpretation. As such, the sample analytical results will be discussed in the next update report.

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

Signed: Andy Verbonitz

Title: EHS Specialist

Submit Date: 06/27/2025

Email: averbonitz@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: Nick Cholas

Date: 08/11/2025

Remediation Project Number: 34380

COA Type**Description**

	ECMC has processed this form as an update. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
	Attachment Doc #404258078 states 'Certification by Pace Analytical Services, LLC is invalid.' Operator shall explain on Supplemental Form 27.
2 COAs	

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**

404256925	FORM 27-SUPPLEMENTAL-SUBMITTED
404258078	ANALYTICAL RESULTS
404258284	MONITORING REPORT

Total Attach: 3 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)