

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Krystal Heibel

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: OWN RESOURCES OPERATING LLC | Operator No: 10699 | Phone Numbers |
| Address: 305 S RIDGE STREET #6279 | | Phone: (970) 332-3585 |
| City: BRECKENRIDGE | State: CO | Zip: 80424 |
| Contact Person: Niels Phaf | Email: neils.phaf@ownresources.com | Mobile: (713) 628-7339 |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36078 Initial Form 27 Document #: 403836168

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

Yes Multiple Facilities

| | | | |
|--|---------------------|------------------------|--|
| Facility Type: WELL | Facility ID: _____ | API #: 125-08759 | County Name: YUMA |
| Facility Name: MC CONNELL 5-11 | Latitude: 40.323690 | Longitude: -102.597140 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SESW | Sec: 11 | Twp: 4N | Range: 47W Meridian: 6 Sensitive Area? Yes |

| | | | |
|--|---------------------|------------------------|--|
| Facility Type: LOCATION | Facility ID: 304606 | API #: _____ | County Name: YUMA |
| Facility Name: MC CONNELL-64N47W 11SESW | Latitude: 40.323690 | Longitude: -102.597140 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SESW | Sec: 11 | Twp: 4N | Range: 47W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use non irrigated
crop

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

domestic well approximately 4430' north, irrigation well approximately 3685' northwest, irrigation well approximately 2103' east water depth >160 feet , livestock well approximately 2480' southwest, domestic/livestock well approximately 2530' west southwest, water depth >205, designated groundwater management area, designated basin, freshwater emergent approx. 615 feet, 1108 feet & 1824 feet however, none present at the time, well is not in a high priority habitat.

DENIED

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 | Moderate | Soil Analyses |

INITIAL ACTION SUMMARY

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

No initial action or emergency response measures taken, this is for a planned P& A. Scope of Work: Wellhead, location ID# 304606. Produced water line will be disconnected at McConnell 14-11 location ID#338104, gas flowline will be disconnected at off site meter shed location ID#469751 which is a shared meter shed and it will not be removed.. Flowlines will be cut and capped and abandoned in place.

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):

A total of four soil samples were collected from the following locations: Wellhead, Water Disconnect, Gas Disconnect, and a Background sample approximately 30 feet from the wellhead. Soil screen was done along four walls and floor quadrants of all excavation areas, wellhead, waterline disconnect, gas flowline disconnect. An environmental assessment was conducted along the length of the flowline, and no visual evidence of staining, dead vegetation or previous impacts identified. No positive readings during the field screening or pressure testing at wellsite or flowline; therefore, no additional samples were collected. All samples were submitted for laboratory analysis in accordance with Table 915-1; however, laboratory analyses was performed outside of the recommended holding time.

Proposed Groundwater Sampling

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

No groundwater encountered during any excavations

Proposed Surface Water Sampling

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

No surface water encountered

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 4

Number of soil samples exceeding 915-1 4

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 10.4

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

BTEX > 915-1 No

Approximate areal extent (square feet) 2046

Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

A background sample from an undisturbed area was collected approximately 30 feet from the wellhead. The sample is the baseline for Table 915-1 reclamation standards. Analysis shows elevated arsenic at 1.48.

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? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Elevated SAR levels identified at the wellhead (10.4) and exceeded pH levels on all samples except background. Arsenic concentrations were elevated in all samples, including the background, indicating it is naturally occurring in the area.

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.

Remediation of existing impacts will be address through in-situ soil treatment. The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area. Beyond the selected remediation approaches we will also apply "Soft Soil" for soil conditioning and perform mechanical de-compaction to promote water infiltration. Treated areas will be monitored, and confirmation soil samples will be collected to verify that remedial actions have achieved reclamation goals.
1. SAR is elevated at the wellhead - soil will be treated with Reclaim.
2. pH is elevated at all locations - sulfur will be applied to lower pH levels and rebalance soil chemistry
3. Arsenic -soil will be treated with Gypsum and Reclaim, however concentrations were elevated in the background, indicating it is naturally occurring in the area. Implementation of the remedial actions is scheduled for Summer- 2025.

One confirmation soil samples at the wellhead will be collected in Q3 2026 and analyzed to evaluate soil suitability for reclamation

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Excavate and offsite disposal

 Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other Soft Soil, Sulfur and Reclaim and gypsum as recommended by local soil specialist. _____

_____ 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 _____

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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs. We also have an approved assurance plan under option 5.

Operator anticipates the remaining cost for this project to be: \$ 250 _____

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 well pad and disconnect disturbed areas were recontoured to closely match the pre-disturbance grade and surrounding topography. Final grading is scheduled for late summer 2025. To address compaction and restore soil function, the reclaimed area will be deep ripped to a depth of 12 to 18 inches, to improve infiltration and root penetration. After soil preparation, the area will be seeded with a native pastureland mix appropriate for the site's land use. Straw mulch will be crimped into the surface to retain soil moisture and reduce erosion. Noxious weeds will be monitored through seasonal visual inspections, and control measures will be implemented as needed based on site-specific vegetative cover conditions. Reclamation activities will be conducted in accordance with Rule 1003 requirements.

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? Yes

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 08/19/2024

Proposed date of completion of Reclamation. 11/18/2027

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. 06/24/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/19/2024

Proposed site investigation commencement. 08/19/2024

Proposed completion of site investigation. 11/18/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/15/2024

Proposed date of completion of Remediation. 11/15/2025

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:

Some milestones had not been updated, recent soil analysis gave an updated approach.

OPERATOR COMMENT

COA's from Doc #403836168 are addressed as follows:

1. Flowlines were cut & Capped and abandoned in place.
2. An environmental assessment was conducted with no evidence of impacts identified and no failures observed during the pressure test of the flowlines.
3. All Operator summary tables and analytical are uploaded for review
4. One confirmation soil samples at the wellhead will be collected in Q3 2026 and analyzed to evaluate soil suitability for reclamation.

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

Signed: Azucena TorresTitle: Remediation & ReclamationSubmit Date: 06/17/2025Email: azucena.torres@ownresources.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: 36078**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 |
|-------------|----------------------------------|
| 404230816 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 404230977 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404230981 | ANALYTICAL RESULTS |
| 404238201 | SOIL SAMPLE LOCATION MAP |
| 404238203 | SOIL SAMPLE LOCATION MAP |
| 404238204 | SOIL SAMPLE LOCATION MAP |
| 404238205 | SOIL SAMPLE LOCATION MAP |
| 404243350 | PHOTO DOCUMENTATION |

Total Attach: 8 Files

General Comments

| User Group | Comment | Comment Date |
|---------------|--|--------------|
| Environmental | Attached document(s) indicate that volatile organic compounds analyzed by EPA Method 8260 were analyzed outside of EPA recommended holding times. ECMC has denied this Form 27, Operator is directed to submit a replacement Form 27 as soon as possible with a plan for resampling. | 08/15/2025 |

| | | |
|---------------|---|------------|
| Environmental | <p>Organics 8270 has a 14 days from collection to prep hold, once prepped there is a 40 day hold time to run the sample. 8260 is 14 days from sample collection to complete the analysis. Both methods 8260 and 8720 require preservation of soil samples by cooling 0 - 6 °C; samples may be accepted for same day delivery > 6 °C if packed on ice</p> <p>TPH: GRO should likely follow 8260 and DRO-ORO should likely follow 8270 above</p> <p>Metals Table 915-1 excluding CrVI: 6 month hold time collection to analysis, preservation not required</p> <p>Hexavalent Chromium CR-VI: Prep by 3060A followed by analysis 7196/7199: 30 days from sample collection to extraction, 7 days from extraction to analysis; requires preservation of soil samples by cooling 0 - 6 °C; samples may be accepted for same day delivery > 6 °C if packed on ice</p> | 08/15/2025 |
|---------------|---|------------|

Total: 2 comment(s)

DENIED