

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Chris Sanchez

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: CITATION OIL & GAS CORP	Operator No: 17180	Phone Numbers Phone: (281) 891-1550 Mobile: (713) 702-7534
Address: 14077 CUTTEN RD		
City: HOUSTON	State: TX	Zip: 77069
Contact Person: Bob Redweik	Email: bredweik@cogc.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 31938 Initial Form 27 Document #: 403366790

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 #: 017-06522	County Name: CHEYENNE
Facility Name: WHITE 22-25 3	Latitude: 38.889893	Longitude: -102.734151	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 25	Twp: 13S	Range: 48W Meridian: 6 Sensitive Area? Yes
Facility Type: LOCATION	Facility ID: 311526	API #: _____	County Name: CHEYENNE
Facility Name: WHITE 22-25-613S48W 25SENW	Latitude: 38.889893	Longitude: -102.734151	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 25	Twp: 13S	Range: 48W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Agricultural Farming

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

Surface water is present in the area in the form of ephemeral streams and small reservoirs. The closest surface water feature to the site is an unnamed ephemeral drainage to Little Spring Creek. Little Spring Creek is an ephemeral drainage that ultimately drains to the Arkansas River, which is a perennial water body. The unnamed drainage feature is approximately 238 feet to the west of the site, and it joins Little Spring Creek approximately 1.1 miles downgradient of the site. The closest downstream perennial water body is the Arkansas River, which is more than 54 miles south of the site. The closest occupied building and livestock are approximately 0.43 miles NE of the site.

Colorado's DWR Well Permit Resource data identified zero geophysical log wells within 1/4 mile of the site. The site is located within the extents of the Colorado Parks and Wildlife (CPW) High Priority Habitat (HPH) designated for the Estimated Occupied Range and Connectivity Area for the Lesser Prairie Chicken.

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 checked="" 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
No	SOILS	N/A	Soil Sampling

INITIAL ACTION SUMMARY

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

This is a site investigation to determine if impacts are present.

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):

One (1) soil grab sample will be collected as described in the attached proposed sample location map. One (1) background sample will be collected from an adjacent, upgradient location. All grab samples will be utilized for full Table 915-1 listed constituents. The background sample will be analyzed for EC, SAR, pH, boron, and metals.

Proposed Groundwater Sampling

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

Should groundwater be encountered, a sample will be collected as soon as practical and shall be submitted for laboratory analysis of Table 915-1 Inorganic Parameters and Organic Compounds in Groundwater.

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):

Soil on location will be field screened with a PID and EC probe.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 2

Number of soil samples exceeding 915-1 0

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

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 1.73

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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?
 One (1) background soil sample (BKG01) was collected from upgradient and off location to the north at a depth of 5 feet bgs and was submitted for analysis of pH, EC, SAR, Boron, and Table 915 metals. The soil sample exhibited pH, arsenic, and barium levels in exceedance of the applicable Table 915 limits indicating that these constituents are naturally occurring.

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.
 No soil was removed from the location.

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.
 One (1) soil sample SS01 was collected from approximately 5 feet below ground surface (bgs) adjacent to the cut and capped wellhead, where impacts would be most likely to exist. The soil sample was submitted for laboratory analysis of the full Table 915 analytical suite. One (1) background soil sample (BKG01) was collected from upgradient and off location to the south east at a depth of 5 feet bgs and was submitted for analysis of pH, EC, SAR, Boron, and Table 915 metals. Based on background concentrations of metals and pH, sample SS01 is in compliance with all applicable standards. While pH is elevated in sample SS01, there are no other indicators of a potential release and pH is also elevated in the background sample BKG01. Consequently, Citation requests that this be considered representative of native soil conditions and that no additional investigation be required at this time. Analytical results, soil sample locations, and photo documentation are included in the attachments.

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 _____ 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 _____

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.

Citation carries general liability insurance of \$2,000,000, with excess liability insurance of \$35,000,000. Citation also carries pollution/waste liability insurance of \$20,000,000, and environmental related liability insurance of \$3,000,000 for all active wells and \$1,000,000 for all plugged and abandoned wells. Citation maintains \$1,135,000 in surety bonds with the COGCC. There is no site-specific financial assurance associated with this remediation project. Citation does not intend to file an insurance claim for this remediation project.

Operator anticipates the remaining cost for this project to be: \$ 10000 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No _____

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? Yes _____

Does the previous reply indicate consideration of background concentrations? Yes _____

Does Groundwater meet Table 915-1 standards? Yes

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.

Following wellhead removal activities, the location was backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with COGCC 1000 series.

Is the described reclamation complete? Yes

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. 01/31/2024

Proposed date of completion of Reclamation. 01/31/2024

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. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/16/2023

Proposed site investigation commencement. 01/31/2024

Proposed completion of site investigation. 08/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/01/2025

Proposed date of completion of Remediation. 09/30/2025

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:

See operator comment

OPERATOR COMMENT

This is the 1Q2025 quarterly update for this location. Due to local resource limitations and the need to address higher priority sites, Citation was unable to keep up with quarterly progress for this project. Moving forward, Citation has addressed the situation and will continue with quarterly reporting as required by the ECMC to progress this project. During 4Q2024, the location was inspected to document the status and further evaluate a plan of action. Citation is currently developing this plan and will be increasing remediation efforts for 2025 by retaining additional third-party contractor support starting 2Q2025.

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

Signed: Joel Mason

Title: Agent

Submit Date: 03/29/2025

Email: joel.mason@absarokasolutions.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: Chris Sanchez

Date: 08/27/2025

Remediation Project Number: 31938

COA Type**Description**

	Operator submitted this form outside of the approved reporting schedule (Quarterly). In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days); additional violations may result in enforcement. Operator did not submit a Second Quarter Supplemental Update in accordance with Rule 913.e. Operator shall provide a supplemental Form 27 for third quarter 2025. In addition, the Operator shall provide additional details for late reporting and processes implemented to keep from late reporting in the future.
	Per COA in Form 27 document no.403832168 Operator has not identified the presence or absence of an on location or off location flowline for the associated Facility. Operator shall provide information identifying the presence or absence of Flowlines.
	Prior to closure of this Remediation Project, Operator shall provide all laboratory analytical report(s) as a stand-alone attachment(s) via Supplemental Form 27. The Laboratory Report PDF(s) must be secured by the issuing laboratory; If there is a difference between the creation date and secured date of the PDF, Operator shall provide an explanation in the case narrative of the associated report.
	Operator shall continue Quarterly Reporting until the Site Assessment is completed and the remediation area demonstrates Compliance with Table 915-1 Standards.
	Arsenic concentrations in confirmation soil samples exceed the Table 915-1 Residential Soil Screening Level Concentrations and are greater than 1.25 times the arsenic concentration in the background sample. Operator will provide additional data to characterize arsenic concentrations at the site and to determine its source in the next quarterly report.
5 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**

403974948	FORM 27-SUPPLEMENTAL-SUBMITTED
404136380	ANALYTICAL RESULTS
404136381	ANALYTICAL RESULTS
404136382	PHOTO DOCUMENTATION
404136383	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)