

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
KRIS NEIDEL

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>SCOUT ENERGY MANAGEMENT LLC</u>	Operator No: <u>10779</u>	Phone Numbers
Address: <u>13800 MONTFORT DRIVE SUITE 100</u>		Phone: <u>(970) 551-8320</u>
City: <u>DALLAS</u> State: <u>TX</u> Zip: <u>75240</u>		Mobile: <u>(970) 902-0518</u>
Contact Person: <u>Cody Christian</u>	Email: <u>cody.christian@scoutep.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 23356 Initial Form 27 Document #: 402996447

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

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>103-40252</u>	County Name: <u>RIO BLANCO</u>
Facility Name: <u>EMERALD 113</u>	Latitude: <u>40.084166</u>	Longitude: <u>-108.882166</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>6</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications GM Most Sensitive Adjacent Land Use Livestock Grazing
 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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Unknown	Field Screening via PID and visual

INITIAL ACTION SUMMARY

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

In accordance with Rule 911.a, Scout is submitting this Form 27 to close the orphan well pad. Historically in this area Scout has occasionally encountered what appears to be historical drill cuttings remaining adjacent to the wells. This Form 27 workplan is being submitted to address the cuttings if encountered. Scout collected five (5) soil samples from locations most likely to have been impacted at the orphan well pad as described in the attached Site Investigation Report dated March 20, 2025. All sample analytical results are below ECMC Table 915-1 RSSL cleanup concentrations and modified background soil concentrations. Initial Form 27 (doc #402996447) included an approved reduced analyte suite for the decommissioning samples.

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):

Please see Appendix A of attached Site Investigation Report dated March 20, 2025. In June 2022, Scout acquired the Whiting assets in this area and took ownership of the orphan locations formerly owned and maintained by Whiting. As part of the transfer of operatorship process, Scout took ownership of the background soil sampling reports and analytical data from Whiting. Scout intends to apply the analytical data from the background soil sampling efforts to the orphan location closures to determine whether contaminants of concerns identified through future soil sampling are naturally occurring in the area, or are due to potentially historic impacts at the orphan locations. The analytical lab reports for this background sampling are attached to this Form 27.

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 5
Number of soil samples exceeding 915-1 5
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 63
-- Highest concentration of SAR 5.48
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) _____
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
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?

Multiple discrete background grab samples were collected throughout the field to determine the naturally occurring background concentrations of EC, SAR, pH, and Arsenic. The resulting lab data indicated that EC ranged from 0.178 to 10.4 mmhos/cm, SAR was < 6, pH ranged from 7.71 to 9.04, and arsenic ranged from 4.16 to 8.08 mg/kg. These ranges along with Table 915-1 were utilized to evaluate the onsite samples. Please see Appendix A of the attached Site Investigation Report for additional details on the background samples.

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.

If encountered the cuttings will be removed via a combination of mechanical and hand excavation in an effort to minimize disturbing the surrounding vegetation. The removed cuttings will be staged onsite.

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.

If encountered the cuttings (or any impacted material) will be staged and shredded onsite adjacent to the wells. The cuttings will then be processed through a soil shredder with a combination of soil and/or amendments at a ratio necessary to achieve Modified Table 915-1 Cleanup Concentrations.

Soil Remediation Summary

In Situ Ex Situ

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

_____ Excavate and offsite disposal
_____ 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.

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.

The policies described below afford industry standard terms and conditions for said policy types, noting that that Scouts pollution coverage is broadened pollution legal liability which does not dictate cover based on gradual pollution or sudden or accidental pollution losses. The coverage is intended to respond if a loss occurs during the policy period as respects to a particular property (owned, leased, operated). Note that all layers of excess coverage shown act in excess of the general liability policy, and note that only the Lead \$10M Umbrella policy is afforded in excess of Pollution coverage.

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

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? Yes _____

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.

The location will be reclaimed to the present grade of the location or to the approximate original contour of the landscape and consistent with the 1000-series Rule. Seeding of the disturbed area will be performed in accordance with its intended use. The seed mix will be prescribed by the landowner. There are no known noxious weeds in the immediate area of the disturbance.

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/01/2022

Proposed site investigation commencement. 06/15/2022

Proposed completion of site investigation. 08/22/2022

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

Additional information regarding this site assessment can be found in the attached Site Investigation Report.

Five (5) soil samples were collected from the former wellhead, area of concern, and tailings piles at Emerald 113 Pad on June 15, 2022 and August 22, 2022 and analyzed for ECMC Table 915-1 contaminants of concern. The locations of the former wellhead, area of concern, and tailings pile are shown on Figure 2.

Results from the discrete soil sample collected from the wellhead on June 15, 2022, exhibited arsenic exceedances greater than ECMC Table 915-1 RSSLs and background levels. To address this exceedance, Scout processed the soil adjacent to the wellhead through a soil shredder with a combination of soil and/or amendments at a ratio necessary to achieve ECMC Table 915-1 Cleanup Concentrations. A subsequent discrete soil sample was collected adjacent to the wellhead on August 22, 2022, for arsenic, which was detected at concentrations below the ECMC Table 915-1 cleanup concentrations.

Site soil conditions and soil sample laboratory analytical results are provided in Table 1 and Table 2. Based on the results of the assessment of the soil conditions at the AOC, wellhead, and tailings pile, the location does not demonstrate any exceedances for ECMC Table 915-1. Therefore, Scout requests approval for No Further Action (NFA) associated with the Emerald 113 Pad.

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

Signed: Cody Christian

Title: HSE Coordinator

Submit Date: 03/31/2025

Email: cody.christian@scoutep.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: KRIS NEIDEL

Date: 09/12/2025

Remediation Project Number: 23356

COA Type**Description**

	Based on review of information presented it appears that no further action is necessary at this time, and ECMC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required at the site.
1 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**

403731899	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404136252	ANALYTICAL RESULTS
404136254	ANALYTICAL RESULTS
404137195	SITE INVESTIGATION REPORT
404137198	ANALYTICAL RESULTS
404137199	ANALYTICAL RESULTS
404137200	ANALYTICAL RESULTS
404137201	ANALYTICAL RESULTS
404137202	ANALYTICAL RESULTS
404137203	ANALYTICAL RESULTS
404137204	ANALYTICAL RESULTS
404137206	ANALYTICAL RESULTS
404137208	ANALYTICAL RESULTS
404137209	ANALYTICAL RESULTS
404137210	ANALYTICAL RESULTS
404137211	ANALYTICAL RESULTS
404137213	ANALYTICAL RESULTS
404137214	ANALYTICAL RESULTS

Total Attach: 19 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Request for modified 915-1 sampling was approved on doc 402996447.	08/18/2025
Environmental	Surface disturbances shall be reclaimed in accordance with the 1000 Series Reclamation Regulations. Consult with ECMC Reclamation Specialist regarding final reclamation.	08/18/2025

Total: 2 comment(s)