

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 17778 Initial Form 27 Document #: 402641278

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: SPILL OR RELEASE | Facility ID: 477274 | API #: _____ | County Name: RIO BLANCO |
| Facility Name: MC Hagood A8 | Latitude: 40.148365 | Longitude: -108.949170 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: NWNW | Sec: 15 | Twp: 2N | Range: 103W Meridian: 6 Sensitive Area? No |

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Non Crop Land
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

The nearest "surface water" is an unnamed dry ephemeral drainage approximately 470 feet south west of the spill origin.

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 |
|-----------|----------------|------------------------|----------------|
| Yes | SOILS | 781ft. x 2ft. x 0.5 ft | Field Measured |

INITIAL ACTION SUMMARY

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

A 5.66 bbl produced water spill to land from a buried 3 inch Corvel coated line just off of pad at MC Hagood A8. 5 bbls of fluids were recovered, line was immediately isolated upon discovery and all proper notifications were made. The spill originated from 6 ft. underground. Area was water washed with clean water from the main water plant. A soil sample was collected within the length of the spill. A soil sample location map and preliminary analytical results are included as an attachment.

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):

Preliminary soil samples were collected on July 8, 2020 from beneath the repaired flowline and on July 14, 2020 from the impacted area. Six (6) grab samples analyzed for Table 910-1 parameters were collected at depths ranging from 0 to 6 feet below ground surface (ft-bgs). Results show elevated SAR and EC levels within the impacted area. Subsequent soil samples analyzed for SAR will be collected from Origin and SS1-SS4 sample locations and for EC from origin, SS1, SS2 and SS4 sample locations during 2021 to monitor natural attenuation. SAR and EC impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized.

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 4

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 1562

NA / ND

-- Highest concentration of TPH (mg/kg) 262

-- Highest concentration of SAR 13.4

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 7

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

_____ 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 background soil sample was collected as part of this investigation. Results may be found in the attached analytical results. A historical background sample associated with a nearby past release was also selected. The referenced analytical results may be found under "Related Forms" for this update.

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?

Confirmation samples will be collected following the removal of contaminated soils around HA8-SS2.

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.

TPH impacted soils will be removed from the area around sample location HA8-SS2, an approximate area of 50 sq. ft. to a depth of 6-12 inches, using hand tools and equipment. All impacted soils will be taken to the Scout Rangely Landfarm.

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.

Organic impacts will be treated ex-situ by excavation. Confirmation samples at HA8-SS2 will be collected in 2026 to ensure that source removal and remediation of TPH was adequate.

SAR and EC impacted soils were treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events were utilized and subsequent soil samples were collected. Results indicate that as of April 23, 2025 natural attenuation has been achieved for inorganic impacts both along the spill path and beneath the affected line.

Soil Remediation Summary

In Situ

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

Ex Situ

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 1
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.

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 reclamation is necessary, it will be completed following 1000 Series regulations.

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. 07/08/2020

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/14/2020

Proposed site investigation commencement. _____

Proposed completion of site investigation. 07/14/2020

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

Confirmation soil samples were collected on April 23, 2025 from HA8-SS1 through HA8-SS4. Each grab sample was collected at a depth of 0-6 inches below ground surface and analyzed for past overages to Table 915-1 as well as analytical parameter gaps between Table 910-1 and Table 915-1. Results indicate the only current exceedance to Table 915-1 standards above local background levels is TPH at HA8-SS2. Please see the attached documents for sample locations, depths and analytical results.

A small scale cleanup of TPH in the portion of the spill path immediately adjacent to SS2 will be conducted and a confirmation sample at this sample location will be collected in 2026. As the rest of the spill path has attenuated to Table 915-1 standards, a reduced analyte list of TPH at SS2 only is requested for all future samples.

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 I

Submit Date: 06/12/2025

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: 09/26/2025

Remediation Project Number: 17778

COA Type**Description**

| | |
|--------|---|
| | Per Rule 915.e.(2).C. modified list of contaminants of concern is approved as requested with the addition of COA requiring sampling of SS2, SS3, SS4. |
| | In addition to requested sampling, Samples shall be collected for EC and SAR in the following area, SS2, SS3, SS4. |
| | Annual reporting and sampling is approved. |
| 3 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**

| | |
|-----------|--|
| 404235942 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 404236062 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404236078 | ANALYTICAL RESULTS |
| 404239268 | SOIL SAMPLE LOCATION MAP |
| 404370125 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 5 Files

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

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

Total: 0 comment(s)