



555 17th Street, Suite 3700
Denver, CO 80202
(303) 293-9100 phone
www.civitasresources.com

Highpoint Operating Corporation
Location: NHF Laura 4-63-3 SWNW
Facility ID: 476919

Initial Action Summary

On August 8, 2024, Highpoint Operating Corporation (Highpoint), a wholly-owned subsidiary of Civitas Resources, Inc. was informed of a data integrity issue that was conducted by an employee of Eagle Environmental, LLC (Eagle) and after gathering some initial data to determine the extent of the issues, Highpoint notified Colorado's Energy and Carbon Management Commission (ECMC). An internal audit was conducted, and a list of impacted projects were disclosed to the ECMC. This project is being reopened to reassess the spill and remediate any remaining impacts.

Please see documents #402714468 and #402860059 for a summary of initial actions completed by Eagle Environmental pertaining to the cut/cap investigation. Between August 5, 2021, five (5) soil samples were collected within the investigation area and seven (7) other locations were field screened using a field calibrated photo-ionization detector (PID). No background soil samples were collected. Upon receipt of the results, Eagle Environmental manipulated the analytical report and led Highpoint personnel to believe the results were in compliance with ECMC Table 915 standards. A No Further Action (NFA) request was submitted, and the project was deemed closed.

Thorough analysis of the laboratory results indicated several discrepancies between the original Origins Laboratory, Inc. (Origins) laboratory report and what was reported by Eagle. Please see the Operator Comments Section of this Form for a detailed description of the discrepancies. After further review, the following Table 915-1 Protection of Groundwater Soil Screening Levels (GWSSLs) exceedances are present in the site assessment soil samples:

- Sodium adsorption ratio (SAR) and pH were detected at concentrations outside of ECMC Table 915-1 range in one (1) soil sample collected from within the investigation area (WV-FS-01@4.25').

Excluding SAR and pH in the sample detailed above, all other constituents of concern were compliant with ECMC Table 915-1 GWSSLs.