

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404153042
Receive Date:
04/22/2025

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37429 Initial Form 27 Document #: 403953256

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: <u>WELL</u>	Facility ID: _____	API #: <u>125-08021</u>	County Name: <u>YUMA</u>
Facility Name: <u>HERBERT 32-9</u>	Latitude: <u>39.899780</u>	Longitude: <u>-102.190750</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>9</u>	Twp: <u>2S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>304166</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>HERBERT-62S43W 9SWNE</u>	Latitude: <u>39.899780</u>	Longitude: <u>-102.190750</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>9</u>	Twp: <u>2S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: OFF-LOCATION FLOWLINE Facility ID: 464348 API #: _____ County Name: YUMA
 Facility Name: Production Line 9NWSE Latitude: 39.896490 Longitude: -102.191690
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: NWSE Sec: 9 Twp: 2S Range: 43W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION Facility ID: 468071 API #: _____ County Name: YUMA
 Facility Name: HERBERT 32-9 Latitude: 39.900920 Longitude: -102.192210
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: SWNE Sec: 9 Twp: 2S Range: 43W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use pasture Land
 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

Livestock well approximately 400' to west, livestock well approximately 1450' northwest, livestock well approximately 1600' northwest, ground water depth >30', designated groundwater management area, designated groundwater basin, mule deer severe winter range, Intermittent stream approximately 600 feet west and a Fresh Water Emergent west, however none present currently.

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 Analysis

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 required or taken, this submission is for a planned well P&A. Scope: Wellhead location ID 304166, water flowline disconnect at off location water tank (location ID 468071), the gas disconnect at off location meter shed (location ID 302994). The meter shed is a shared meter with other wells, therefore it will not be removed. The off-site gas flowline and water pipeline was 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 6 soil samples were collected from the following locations: one at the wellhead, one at the gas disconnect at the off-location meter shed, one at the bottom of the produced water tank, one at the produced water tank inlet, one at the bend in the flowline, and one background location approximately 60 feet from the wellhead.

Field screening was conducted at all relevant areas, including the shared meter shed, wellhead, produced water tank, the full extent of the flowlines, and all four excavation areas—each screened along all wall and floor quadrants.

The flowlines were pressure tested, and no additional impacts were identified during either the field screening or pressure testing. Therefore, no further sampling was necessary. All collected soil samples were analyzed in accordance with Table 915-1.

Proposed Groundwater Sampling

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

Groundwater is not expected in any of the excavations, water depth >30FT

Proposed Surface Water Sampling

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

no permanent surface water in area

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 6 -- Highest concentration of TPH (mg/kg) 100
 Number of soil samples exceeding 915-1 6 -- Highest concentration of SAR 7.68
 Was the areal and vertical extent of soil contamination delineated? Yes BTEX > 915-1 No
 Approximate areal extent (square feet) 4154 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 60 feet from the wellhead. The sample will be used as a baseline for Table 915 reclamation standards and had high Arsenic at 3.08 mg/kg.

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.
 Soil analysis from Summit Scientific shows levels exceeded table 915-1 on pH, SAR, boron, and arsenic.
 1. pH at the Wellhead 10.0, Tank 8.94, Tank Inlet 9.15, Flowline Bend 8.73, Gas Disconnect 8.59, and Background level at 0.0620 was within limit.
 2. SAR exceeded at the Tank 7.68.
 3. Boron exceeded at the Wellhead 2.16 and Tank 2.47.
 4. Arsenic levels exceeded on all samples- Wellhead 3.02, Tank 4.42, Tank Inlet 3.63, Flowline Bend 4.53, Gas Disconnect 5.13, and Background at 3.08 mg/kg, indicating concentrations may reflect naturally occurring conditions.

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 – We will focus our efforts on improving soil structure, natural attenuation, and applying soil amendments to address elevated contaminant levels. The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area. Soil conditioning and de-compaction will involve incorporating soft soil to improve soil structure, followed by mechanical de-compaction to promote water infiltration.

Use of Soil Amendments:

1. SAR, Boron, and Arsenic- Application of Reclaim and gypsum to mitigate high SAR and reduce bioavailability of boron and arsenic.
2. pH- Application of sulfur to lower pH levels and rebalance soil chemistry.
3. Arsenic-No Further Action (NFA). The detected concentration on the background sample at 3.08 mg/kg aligns with naturally occurring levels in the area, further remedial action is not necessary.

No actions to be taken at gas disconnect since location has active meter shed. Implementation of the remedial actions is scheduled for Summer– 2025.

Confirmation samples will be collected and analyzed in Q3 2026 at the tank and wellhead to assess soil suitability, evaluate the effectiveness of remediation efforts, and determine compliance with Table 915-1 standards.

Estimated Time to NFA: Based on site-specific conditions and agronomic guidance, the site is expected to reach No Further Action (NFA) status within 1–2 years.

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 # _____

Yes _____ Natural Attenuation

_____ Excavate and onsite remediation

Yes _____ Other De-compaction, Soil Treatments (Soft Soil, Reclaim, Sulfur and Gypsum) as needed _____

_____ 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.

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.

Reclamation will be completed in accordance with Rule 1003 and applicable to surface owner agreement. The well pad and all associated disturbed areas will be re-contoured to closely match the original pre-disturbance grade and surrounding area. Grading will be completed in a manner that promotes proper drainage. To restore soil health and support revegetation, compaction alleviation will be conducted as needed. These methods will be applied based on where soil testing indicated elevated levels or visual screening indicators suggest significant compaction. Seeding will occur during the first favorable season after re-contouring and de-compaction, using an approved native pastureland seed mix. Straw will be crimped to retain moisture, and noxious weeds will be managed with appropriate control measures.

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. 12/09/2024

Proposed date of completion of Reclamation. 05/28/2027

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. 10/10/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/05/2024

Proposed site investigation commencement. 11/05/2024

Proposed completion of site investigation. 02/07/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/09/2024

Proposed date of completion of Remediation. 06/30/2026

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:

Milestones were updated based on soil samples results. The analysis has given an updated approach.

OPERATOR COMMENT

The COA were address in the following form:

- 1) Analytical results are attached for review by ECMC.
- 2) A visual field screening inspection was conducted and documented on the photobook attached.
- 3) The map for actual soil sample collected is attached for review.
- 4) Gypsum has been historically applied to address elevated SAR, local agronomist has recommended a new soil amendment application that will be used to address pH, boron, and arsenic stabilization.
- 5) No Groundwater encountered, no additional sampling needed.
- 6) Permit No. 11369 states water level was measure in 1962. The other nearest well permit No.100349 states water depth level was at 32' however there was clay between surface and the water. See attached document, Water Well Permit#100349. This should protect the water layer. Excavation was at a max. 4' and there have been no known spills in the area.
- 7) Operator pressure tested the flowline and there was no induction of impacts due to the successful pressure test.
- 8) Soil samples collected, submitted to lab for full Table 915-1 analysis including bend in the line, documented in both the photobook and map attached.

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

Signed: Azucena Torres

Title: Reclamation & Remediation

Submit Date: 04/22/2025

Email: 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: Krystal Heibel

Date: 10/10/2025

Remediation Project Number: 37429

COA Type**Description**

	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.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
	Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.
	Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.

4 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**

404153042	FORM 27-SUPPLEMENTAL-SUBMITTED
404155013	ANALYTICAL RESULTS
404155015	ANALYTICAL DATA SUMMARY TABLE(S)
404172535	REMEDIATION PROGRESS REPORT
404174318	PHOTO DOCUMENTATION
404174319	OTHER
404174748	AERIAL IMAGE
404174749	SOIL SAMPLE LOCATION MAP

404174751	SOIL SAMPLE LOCATION MAP
404174752	SOIL SAMPLE LOCATION MAP
404174754	SOIL SAMPLE LOCATION MAP

Total Attach: 11 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>"Remediation of Existing Impacts – We will focus our efforts on improving soil structure, natural attenuation, and applying soil amendments to address elevated contaminant levels. The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area. Soil conditioning and de-compaction will involve incorporating soft soil to improve soil structure, followed by mechanical de-compaction to promote infiltration.</p> <p>Use of Soil Amendments: 1. SAR, Boron, and Arsenic- Application of Reclaim (or equivalent soil amendment) to mitigate high SAR and reduce bioavailability of boron and arsenic. 2. pH- Application of sulfur to lower pH levels and rebalance soil chemistry. Implementation of the remedial actions is scheduled for Summer– 2025. Confirmation soil sampling will occur in Q3 2026 to evaluate remedial effectiveness and determine compliance with Table 915-1 standards.</p> <p>Estimated Time to NFA: Based on site-specific conditions and agronomic guidance, the site is expected to reach No Further Action (NFA) status within 1–2 years."</p>	10/10/2025

Total: 1 comment(s)