

State of Colorado
Energy & Carbon Management Commission

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404370956
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09/28/2025
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: <u>HIGHPOINT OPERATING CORPORATION</u>	Operator No: <u>10071</u>	Phone Numbers
Address: <u>555 17TH ST STE 3700</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Luke Kelly</u>	Email: <u>LKelly@civiresources.com</u>	
		Phone: <u>(720) 315-8934</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18944 Initial Form 27 Document #: 402714468

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>LOCATION</u>	Facility ID: <u>476919</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>NHF-Laura 4-63-3 SWNW</u>	Latitude: <u>40.345083</u>	Longitude: <u>-104.433000</u>	
	** correct Lat/Long if needed: Latitude: <u>40.345095</u>	Longitude: <u>-104.432992</u>	
QtrQtr: <u>SWNW</u>	Sec: <u>3</u>	Twp: <u>4N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Other: Non-Crop
 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 seasonal Empire Intake Canal is within 1/4 of a mile of the well.

The Monitoring Well (DWR Receipt 0050692, Permit 50692-MH) approx 745-ft to the NE is the nearest permitted water well. This well was permitted to 30-ft, was never constructed, and no static water level was recorded. Monitoring Hole (DWR Receipt 0062052, Permit 62052-MH) is approx 1515-ft to the NE. This well was constructed to 13-ft, no static water level recorded. Residential Well (DWR Receipt # 0224203, Permit 125383-A) is approx 1665-ft NW. This well was constructed to 80-ft, static water level recorded at 31-ft.

Groundwater less than 20 ft is not expected at the disturbance location.

This location is not within 1/4 of a mile of a HPH area.

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 checked="" 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	TBD	Laboratory Analytical

INITIAL ACTION SUMMARY

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

9/28/2025 Update - Due to the size of the updated summary and to preserve the initial project narrative please see the attached Initial Action Summary

A site investigation will be conducted pursuant to COGCC rule 911 at the NHF-Laura oil and gas location (ID 476919) pertaining to decommission of production facilities. See site map exhibit for details.

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):

Site assessment soil samples will be collected from within the investigation area to achieve horizontal and vertical delineation. Horizontal delineation is required north, south, and west of the documented pH and SAR exceedances in soil sample location (WV-FS-01@4.25'). Horizontal compliance east of soil sample (WV-FS-01@4.25') is represented by soil sample location (WV-SS-02@3'). Soil samples will be collected at a depth 1' greater than the previous soil sample locations for vertical delineation. Horizontal delineation samples will be collected at the same depths as the previous soil sample location. See the Proposed Sample Map attached to this form for approximate sample locations. All soil samples will be analyzed for full ECMC Table 915-1 analytes and will be compared to GWSSLs. Upon landowner access approval, at least four (4) additional background soil samples will be collected from homogenous soil horizons and/or corresponding excavation sample depths from nearby offsite and un

Proposed Groundwater Sampling

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

The nearest water well (Permit #125383-A) with a recorded static water level is located approximately 1,665 feet northwest of the NHF Laura 4-63-3 SWNW Pad. The recorded static water level of this well is 31 feet. However, Highpoint proposes to set one temporary monitoring well during delineation activities. The temporary monitoring well will be installed to a maximum depth of drilling refusal or 25 feet bgs, whichever is encountered first to determine regulatory screening levels. If groundwater is encountered a sample will be collected from the temporary monitoring well and analyzed for full ECMC Table 915-1 groundwater analytes.

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 1
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) 67
-- Highest concentration of SAR 9.42
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
_____ 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?

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?

Yes, please see the Proposed Sampling Plan section of this form for details on future sampling.

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.

The impacted material will be removed through mechanical excavation.

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.

Once vertical and lateral delineation is complete and a project scope is developed; HighPoint will outline a detailed remediation strategy in a subsequent Form 27.

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
_____ Natural Attenuation
_____ Other _____

_____ 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 status update

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 General Liability coverage within the Civitas Resources, Inc. insurance program includes coverage for bodily injury, property damage, and pollution clean-up costs arising from qualifying pollution events of a sudden and accidental nature subject to a \$1,000,000 per occurrence limit and \$2,000,000 aggregate limit. The Civitas Resources, Inc. insurance program includes Excess Liability coverage of \$110,000,000 per occurrence and in the aggregate which sits over the sudden and accidental pollution within the General Liability coverage. It is the opinion of Civitas Resources, Inc. that this total tower of limit is adequate to address the costs of remediation associated with any qualifying pollution event.

Operator anticipates the remaining cost for this project to be: \$ 20000

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? No

Does the previous reply indicate consideration of background concentrations? _____

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.

Reclamation occurred in accordance with COGCC 1000 Series Rules.

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? 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. 09/07/2021

Proposed date of completion of Reclamation. 09/13/2021

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. 07/01/2021

Actual Spill or Release date, or date of discovery. 08/13/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/05/2021

Proposed site investigation commencement. 12/27/2025

Proposed completion of site investigation. 03/27/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/25/2026

Proposed date of completion of Remediation. 09/23/2026

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:

Implementation schedules have been adjusted to meet requirements set forth by NOAV document #404289999.

OPERATOR COMMENT

In accordance with Rule 206.a, Civitas Resources, Inc. completed an assessment and identified discrepancies in data previously submitted to the ECMC for this site that were prepared by a third-party consultant without the knowledge and beyond the reasonable control of Civitas Resources, Inc. The following discrepancies were identified in the third-party consultant's report (document #402860071) attached to ECMC Form 27 #402860059.

- Sample ID WV-FS-01 @4.25': The calcium concentration of 0.0823 meq/L was altered to 3.70 meq/L, magnesium concentration of ND was altered to 1.64 meq/L, sodium concentration of 2.65 meq/L was altered to 0.360 meq/L, pH concentration of 9.06 SU was altered to 8.06 SU, and the SAR concentration of 9.42 was altered to 0.220 within the lab report (Origins # Y108108-01) and on pages 7, 11, 37, and 38.

The analytical result alterations resulted in exceedances becoming non-exceedances. The identified data anomalies were allegedly altered by the third-party consultant.

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

Signed: Luke Kelly

Title: Env Advisor

Submit Date: 09/28/2025

Email: LKelly@civiresources.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: 10/13/2025

Remediation Project Number: 18944

COA Type**Description**

	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days).
	Operator shall adhere to Protection of Groundwater Soil Screening Levels
	Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil
	Operator shall collect confirmation soil samples for Full Table 915-1 Contaminants of Concern
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
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
404370956	INVESTIGATION/REMEDIAL ACTION WORKPLAN (SUPPLEMENTAL)
404370957	REMEDIAL ACTION PLAN
404370958	SOIL SAMPLE LOCATION MAP
404370959	SITE INVESTIGATION PLAN
404370960	ANALYTICAL RESULTS
404370961	ANALYTICAL RESULTS
404370962	SOIL SAMPLE LOCATION MAP
404370963	ANALYTICAL DATA SUMMARY TABLE(S)
404370964	ANALYTICAL DATA SUMMARY TABLE(S)
404389792	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 10 Files

General Comments

User Group	Comment	Comment Date
Environmental	Remediation Project # 18944 has been changed from Closed Status to Active Status.	10/13/2025

Environmental	<p>Civitas Resources, Inc. completed an assessment and identified discrepancies in data previously submitted to the ECMC for this site that were prepared by a third-party consultant without the knowledge and beyond the reasonable control of Civitas Resources, Inc. The following discrepancies were identified in the third-party consultant's report (document #402860071) attached to ECMC Form 27 #402860059.</p> <ul style="list-style-type: none"> • Sample ID WV-FS-01 @4.25': The calcium concentration of 0.0823 meq/L was altered to 3.70 meq/L, magnesium concentration of ND was altered to 1.64 meq/L, sodium concentration of 2.65 meq/L was altered to 0.360 meq/L, pH concentration of 9.06 SU was altered to 8.06 SU, and the SAR concentration of 9.42 was altered to 0.220 within the lab report (Origins # Y108108-01) and on pages 7, 11, 37, and 38. 	10/13/2025
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Total: 2 comment(s)