

State of Colorado
Energy & Carbon Management Commission

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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 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>DESERT EAGLE OPERATING LLC</u>	Operator No: <u>10797</u>	Phone Numbers
Address: <u>17330 PRESTON RD STE 200D-208</u>		Phone: <u>(214) 886-5098</u>
City: <u>DALLAS</u> State: <u>TX</u> Zip: <u>75252</u>		Mobile: <u>()</u>
Contact Person: <u>Wesley Marshall</u>	Email: <u>wmarshall@prohelium.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34161 Initial Form 27 Document #: 403693462

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: 905.g.(2) Drill Cuttings

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>484360</u>	API #: _____	County Name: <u>LAS ANIMAS</u>
Facility Name: <u>Red Rocks 35-11</u>	Latitude: <u>37.475295</u>	Longitude: <u>-103.546960</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>35</u>	Twp: <u>29S</u>	Range: <u>55W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485690</u>	API #: _____	County Name: <u>LAS ANIMAS</u>
Facility Name: <u>Red Rocks 35-11</u>	Latitude: <u>37.475420</u>	Longitude: <u>-103.547340</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>35</u>	Twp: <u>29S</u>	Range: <u>55W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications ML

Most Sensitive Adjacent Land Use Rangeland

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

None

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) cement effluence

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Unknown	Sample

INITIAL ACTION SUMMARY

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

Drill cuttings and soils that exhibited white cement effluence were removed from the location and taken to the Trinidad Landfill, a landfill that accepts E&P waste.

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):

Eight (8) discrete soil samples including a background sample were taken in compliance with Rule 905.e. 2 at the potentially affected areas. The background sample location was carefully chosen to avoid areas of known violations or potential impacts from drilling operations. Soil samples were tested for contaminants of concern listed in Table 915-1 to assess the impact. No pathway to groundwater exists.

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 8

Number of soil samples exceeding 915-1 8

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

Approximate areal extent (square feet) 4038

NA / ND

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

-- 7.3 Highest concentration of SAR

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 1

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 discrete background sample was taken.

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.

Source is to remain in situ.

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.

Confirmation soil samples were taken as described in Rule 915.e.(2). to assess the impact or confirm remediation. Samples from comparable, nearby non-impacted native soil were collected and analyzed for purposes of establishing background soil conditions including pH, EC, SAR, and other constituents as identified in the Table 915-1 Cleanup Concentrations - attached map Red Rocks Background Sample Distance Area Figure A-3 (1).pdf. Four of the five background samples contained naturally occurring levels of pH, EC, SAR and boron in excess of Table 915-1 Soil Suitability for Reclamation Cleanup Concentrations. Given that the highest recorded pH values were from undisturbed background samples, further delineation is not warranted or feasible, and further remediation is not beneficial. See attached RR ALL WELLS Sample Breakout - EC.SAR - 20250521.pdf. Rule 915.b, operator requests leaving materials in place. Continuing with the original Reclamation Plan, as outlined in Form 2 (attached), poses no harm to public health, safety, welfare, the environment, or wildlife, and minimizes further soil disturbance

Soil Remediation Summary

In Situ

Ex Situ

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

- Yes Excavate and offsite disposal
- If Yes: Estimated Volume (Cubic Yards) 5
- Name of Licensed Disposal Facility or ECMC Facility ID # _____
- Excavate and onsite remediation
- No Land Treatment
- Bioremediation (or enhanced bioremediation)
- Chemical oxidation
- Other _____

Groundwater Remediation Summary

- No Bioremediation (or enhanced bioremediation)
- No Chemical oxidation
- No Air sparge / Soil vapor extraction
- No Natural Attenuation
- No 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.

No impacted groundwater

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 Potential soil impact and remediation _____

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.

Operator anticipates the remaining cost for this project to be: \$ 5000 _____

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? _____

Does the previous reply indicate consideration of background concentrations? _____

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.

There is no existing or new grade countouring. To decompact soil layers, areas to be reclaimed were ripped to an estimated depth of 18 inches except where restrictive features were encountered at a shallower depth. Interim reclamation was performed during the first growing season after well drilling was completed. The seed mix was identified as a site specific seed mix in coordination with the Natural Resource Conservation Service District Conservationist, the Las Animas County Extension Service, and the surface owner. The seed mix is identified in the attached Interim Reclamation Plan: RR 35-11 Interim Reclamation PlanMod.pdf. The seed weight (pounds/acre) and application rate were provided to the operator by the seed mix provider. The seed mix was certified weedfree. DEO will monitor for noxious and invasive weeds. Weed treatment will be conducted, where needed, to prevent establishment and spread of noxious weeds. The weed treatment will be conducted according to Colorado Department of Agriculture recommendations by weed species. Currently weeds identified on location as noxious are being removed manually. Attached is the soil map for the RR 35-11: RR 35-11 Soil Map.pdf and the Custom Soil Resource Report of the Las Animas County, Colorado, area by the Natural Resources Conservation Service attachment: Attachment C - Custom Soil Resource Report.pdf

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? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/24/2024

Proposed date of completion of Reclamation. 09/30/2025

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. 12/01/2023

Actual Spill or Release date, or date of discovery. 11/29/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/08/2023

Proposed site investigation commencement. 03/08/2024

Proposed completion of site investigation. 04/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/01/2025

Proposed date of completion of Remediation. 09/30/2025

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

Analytical Data for soil samples including chromium hexavalent provided on the attached Summary Table RR 35-11 2025 Soil Sample.pdf and attached RR 35-11 J202416-1 UDS Level 2 Report Rev(2) Final Report.pdf. Background sample locations were carefully chosen to avoid areas of known violations or potential impacts from drilling operations. As described in ECMC RULE 915.E. (2) OPERATOR GUIDANCE, one background sample was taken at the lat 37.475593 long -103.546902 between approximately 57 to 132 feet up-gradient of the seven confirming samples, at depths 1-3'. Additional background samples were taken at four (4) nearby Red Rocks locations. These four (4) off location background samples were carefully chosen to avoid areas of known violations or potential impacts from drilling operations. The attached NRCS map shows the off location background sample points and the distance from the Red Rocks 35-11 background sample. See attachment RR 35-11 Map - Distance to Other Background Sample.pdf. All sample points from all locations for EC and SAR that includes the distance from the background sample taken at that location are on attachment RR ALL WELLS Sample Breakout - EC.SAR - 20250521.pdf. All lab soil samples test results from background and confirmation samples taken at RR 35-08, RR 1-16, RR 1-14, and RR 1-13 are attached:
Soil types are provided in the attached Soil Unit Maps: RR 35-11 Soil Map.pdf; RR 1-13 Soil Unit Map.pdf; RR 1-14 Soil Unit Map.pdf; RR 1-16 Soil Unit Map.pdf; and the RR 35-08 Soil Map.pdf. Also attached is the Custom Soil Resource Report of the Las Animas County, Colorado, area by the Natural Resources Conservation Service attachment: Attachment C - Custom Soil Resource Report.pdf
The locations are on rural ranchland 100% owned by one owner, the nearest residence is > 1 mile away. all are over 1 mile from nearest school facilities, HOBUs, DOAAs, and DICs, all are over 1 mile from high priority habitat, and there is no immediately downgradient surface water. Rule 915.b, operator requests leaving materials in place. Continuing with the original Reclamation Plan, as outlined in Form 2 (attached), poses no harm to public health, safety, welfare, the environment, or wildlife, and minimizes further soil disturbance

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

Signed: Cathy Bulf

Title: Manager

Submit Date: 06/23/2025

Email: cathybulf@gmail.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: 10/24/2025

Remediation Project Number: 34161

COA Type

Description

	The pH and EC of soil samples collected at the Location exceeds the allowable level for Table 915-1 soil suitability for reclamation. Therefore, Operator will define the extent of soil with elevated pH and EC, and if Operator proposes to leave soil with elevated pH and EC in place, Operator will submit a Reclamation plan pursuant to Rule 915.b.
	Background sample SS8 RR3511- BG01 shows signs of Organics Compounds and has a TPH value of 20.0 and is not representative of undisturbed native background conditions near the [well/production facility/spill/release]. These samples shall be omitted from future background determination calculations.
	Operator shall recollect Boron samples for (hot water soluble)).
	Operator shall continue Quarterly Reporting until the Site Assessment is completed and the remediation area demonstrates Compliance with Table 915-1 Standards.
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

404241333	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
404241932	LABORATORY ANALYTICAL REPORT
404241937	CORRESPONDENCE
404242014	ANALYTICAL DATA SUMMARY TABLE(S)
404252013	LABORATORY ANALYTICAL REPORT
404252017	LABORATORY ANALYTICAL REPORT
404252022	LABORATORY ANALYTICAL REPORT
404252057	LABORATORY ANALYTICAL REPORT
404252067	ANALYTICAL DATA SUMMARY TABLE(S)
404252082	MAP
404252088	MAP

404252097	MAP
404252101	MAP
404252161	OTHER
404252229	MAP
404252408	RECLAMATION PLAN
404252533	MAP
404403454	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 18 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)