

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404358589

Receive Date:

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Report taken by:

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>AXIS EXPLORATION LLC</u> | Operator No: <u>10646</u>                 | Phone Numbers<br>Phone: <u>(907) 8886089</u><br>Mobile: <u>( )</u> |
| Address: <u>555 17TH STREET SUITE 3700</u>    |                                           |                                                                    |
| City: <u>DENVER</u>                           | State: <u>CO</u>                          | Zip: <u>80202</u>                                                  |
| Contact Person: <u>Seth Robinson</u>          | Email: <u>srobinson@civiresources.com</u> |                                                                    |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39913 Initial Form 27 Document #: 404106943

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>PIT</u>                      | Facility ID: <u>115110</u> | API #: _____                  | County Name: <u>ELBERT</u>                                     |
| Facility Name: <u>GORDON 1-A</u>               | Latitude: <u>39.506205</u> | Longitude: <u>-104.384931</u> |                                                                |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |                                                                |
| QtrQtr: <u>SWSW</u>                            | Sec: <u>19</u>             | Twp: <u>6S</u>                | Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |
| Facility Type: <u>LOCATION</u>                 | Facility ID: <u>460826</u> | API #: _____                  | County Name: <u>ELBERT</u>                                     |
| Facility Name: <u>GORDON 13-19 1-A</u>         | Latitude: <u>39.506169</u> | Longitude: <u>-104.384346</u> |                                                                |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |                                                                |
| QtrQtr: <u>NWSW</u>                            | Sec: <u>19</u>             | Twp: <u>6S</u>                | Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

Facility Type: SPILL OR RELEASE Facility ID: 490326 API #: County Name: ELBERT  
Facility Name: GORDON 13-19 1-A Latitude: 39.506169 Longitude: -104.384346  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: NWSW Sec: 19 Twp: 6S Range: 62W Meridian: 6 Sensitive Area? No

**SITE CONDITIONS**

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use Cropland

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**

No surface water within 1/4 of a mile.  
Groundwater less than 20 ft is not expected at the disturbance location.  
This location is not within a HPH area. CPW consultation not required.

# 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                       |
|--------------|----------------|--------------------|--------------------------------------|
| UNDETERMINED | GROUNDWATER    | N/A                | Laboratory Analytical if Encountered |
| Yes          | SOILS          | 9' x 16' x 10' bgs | 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.

A site investigation will be conducted pursuant to ECMC rule 911 at the Gordon 13-19 1-A (460826) oil and gas location, decommission of production facilities, and decommission of all on-location flowline(s). See site map exhibit for details.

A site investigation will be conducted pursuant to ECMC rule 911 at the GORDON 1-A pit. The pit was historically backfilled by previous operator. Soil samples will be collected and analyzed per Table 915-1 to investigate whether the former pit location does require remediation prior to final reclamation on this location.

## **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) grab soil samples were collected from the decommissioned facilities, and two (2) composite soil samples were collected from the stockpiled overburden. All soil samples were submitted to a certified laboratory for analysis of Table 915-1 metals and organic compounds, TPH C6-36, EC, SAR, pH, and boron.

Regarding the former pit location, our proposed sampling plan included collecting one grab soil sample at the highest PID interval and at the base of a soil boring. Soil samples will be submitted to a certified laboratory for analysis of Table 915-1 metals and organic compounds in soil, TPH C6-36, SAR, EC, pH, and boron.

### **Proposed Groundwater Sampling**

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

If groundwater is encountered, a grab groundwater sample will be collected from the base of the excavation and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, chlorides, sulfates, and TDS.

### **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 ):

Civitas has requested to close REM# 25816, the site investigation and remediation for the Gordon 1-A pit, which was historically backfilled by the previous operator. Civitas has made this request because the work involving pit investigation is being managed under the facility decommissioning REM# 39913. Source removal and confirmation sampling is ongoing.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 100

Number of soil samples exceeding 915-1 59

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

Approximate areal extent (square feet) 849

### NA / ND

-- Highest concentration of TPH (mg/kg) 4140.49

-- Highest concentration of SAR 55.9

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 30

### 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         

NA Highest concentration of Benzene (µg/l)         

NA Highest concentration of Toluene (µg/l)         

NA Highest concentration of Ethylbenzene (µg/l)         

NA Highest concentration of Xylene (µg/l)         

NA 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?

Eleven (11) background soil samples were collected from homogenous soil horizons and/or corresponding excavation confirmation soil sample depths.

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.

The source will be removed through mechanical excavation at soil sample locations for the decommissioned aboveground storage tank, AST01-FOOTPRINT@0.5', B01@10', B02@10', N01@8', N02@8', N03@8', E01@8', S01@8', S02@8', S03@8', and W01@8'; produced water vault soil sample locations PWV-B01@4' and PWV-N01@2'; separator samples SEP01-INLET@3' and SEP01-OUTLET@3'; and flowline samples FL02@3', FL03@3', FL04@3'.

The source will be removed through mechanical excavation at soil sample locations for the decommissioned aboveground storage tank, produced water vault, separators, flowlines, and historical pit.

The location of the historical pit is currently being excavated to a depth of 20 feet with additional excavation activity scheduled at the base of excavation sample locations along with additional sample locations at depths of 17' bgs along the western sidewall, and 17-18' along the southern sidewall, and northern sidewall at 17' bgs.

Confirmation soil samples will be collected and submitted to a certified laboratory for analysis of Table 915-1 metals and organic compounds, TPH C6-36, EC, SAR, pH, and boron to determine the lateral and vertical extent of impacts. Background samples will be collected from homogenous soil horizons and/or corresponding excavation sample depths.

## REMIATION 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.

Subsequent to source removal, the estimated timeframe to achieve a no further action will be April 30, 2026.

### **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 # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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 Decommission data. \_\_\_\_\_

## 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 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 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 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: \$ 250000 \_\_\_\_\_

## 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? \_\_\_\_\_

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 in accordance with ECMC 1000 Series Rules.

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? \_\_\_\_\_

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. 05/25/2025

Actual Spill or Release date, or date of discovery. 05/23/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/12/2025

Proposed site investigation commencement. 04/15/2025

Proposed completion of site investigation. 07/21/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/21/2025

Proposed date of completion of Remediation. 04/30/2026

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:

\_\_\_\_\_

**OPERATOR COMMENT**

Civitas has requested to close REM# 25816, the site investigation and remediation for the Gordon 1-A pit, which was historically backfilled by the previous operator. Work involving pit investigation is being managed under the facility decommissioning REM# 39913. Source removal and confirmation sampling is ongoing.

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

Signed: Seth Robinson

Title: Senior Env Specialist

Submit Date: \_\_\_\_\_

Email: srobinson@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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 39913

**COA Type****Description**

|       |  |
|-------|--|
| 0 COA |  |
|-------|--|

**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**

|           |                              |
|-----------|------------------------------|
| 404358593 | LABORATORY ANALYTICAL REPORT |
| 404358594 | LABORATORY ANALYTICAL REPORT |
| 404358595 | LABORATORY ANALYTICAL REPORT |
| 404358596 | LABORATORY ANALYTICAL REPORT |
| 404421414 | REMEDATION PROGRESS REPORT   |
| 404421447 | LABORATORY ANALYTICAL REPORT |

Total Attach: 6 Files

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

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

Total: 0 comment(s)