

State of Colorado  
Energy & Carbon Management Commission

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404397473  
Receive Date:  
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Report taken by:  
John Heil

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>QB ENERGY OPERATING LLC</u>	Operator No: <u>10844</u>	Phone Numbers Phone: <u>(970) 778-2314</u> Mobile: <u>(970) 778-2314</u>
Address: <u>1001 17TH STREET SUITE 1600</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jake Janicek</u>	Email: <u>jjanicek@qb-energy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: \_\_\_\_\_ Initial Form 27 Document #: 404273750

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>117247</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PICEANCE CREEK UNIT 35-12</u>	Latitude: <u>39.889912</u>	Longitude: <u>-108.230904</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>12</u>	Twp: <u>2S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>UIC DISPOSAL</u>	Facility ID: <u>159338</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PICEANCE CREEK UNIT T35-12G</u>	Latitude: <u>39.890640</u>	Longitude: <u>-108.231950</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>12</u>	Twp: <u>2S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: WELL	Facility ID: _____	API #: 103-66512	County Name: RIO BLANCO
Facility Name: U S A-PICEANCE CREEK T35-12G	Latitude: 39.890640	Longitude: -108.231950	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 12	Twp: 2S	Range: 97W Meridian: 6 Sensitive Area? Yes

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Facility Type: LOCATION	Facility ID: 316734	API #: _____	County Name: RIO BLANCO
Facility Name: U S A-PICEANCE CREEK-62S97W 12NESW	Latitude: 39.890852	Longitude: -108.231894	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 12	Twp: 2S	Range: 97W Meridian: 6 Sensitive Area? Yes

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Facility Type: NONFACILITY	Facility ID: 435587	API #: _____	County Name: RIO BLANCO
Facility Name: PCU T35-12G 435587	Latitude: 39.890640	Longitude: -108.231950	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 12	Twp: 2S	Range: 97W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications OH 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**

# 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)

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	SOILS	No Impacts	Field investigation and soil sampling

## INITIAL ACTION SUMMARY

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

In order to address potential impacts associated with the decommissioning of the wellhead and pit associated with this location, approximately 150 cubic yards of material was removed from the wellhead and suspected location for the pit. Once this soil was removed, the confirmation samples listed below were collected from soil along the walls and base of the resulting excavations to verify if potential impacts were successfully removed. A five point composite sample was also collected from the resulting stockpile of removed soil. These samples were submitted for laboratory analysis of all analytes listed in ECMC Table 915-1. Laboratory analytical reports indicate that all samples were compliant with ECMC Table 915-1 Residential Soil Screening Level Concentrations except for the measurements listed for arsenic and pH. Please see the Operator Comments Section for how QB Energy plans on addressing these exceedances. Please see attached Site Investigation Report for details on this sampling event. The background soil sample location identified as SB-BG01 can be viewed on a map attached to this form. A soil analytical results table has also been included with this form to summarize the attached laboratory delivered reports.

20250918-T35-12G-(BASE)@10.0  
20250918-T35-12G-(EW)@10.0  
20250918-T35-12G-(FC-PIT)@4.0  
20250918-T35-12G-(NW)@10.0  
20250918-T35-12G-(STOCK)  
20250918-T35-12G-(SW)@10.0  
20250918-T35-12G-(WW)@10.0

## 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 ):

### 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 7

Number of soil samples exceeding 915-1 7

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) 201.9  
2

-- Highest concentration of SAR 5.8

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?

Background samples were collected from undisturbed areas adjacent to this location and the PCU T73-11G location (ECMC Location ID 315260). Please see the attached investigation report and map for details on these samples. Both locations are located within similar soil types and parent material.

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.

There is currently no source identified.

### 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.

There are currently no plans for remediation.

### Soil Remediation Summary

In Situ

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

Ex Situ

- \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_
- \_\_\_\_\_ 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 NFA Request \_\_\_\_\_

## 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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, QB Energy has general liability insurance in the amount of \$5M, and QB Energy has umbrella insurance, which sits over the general liability insurance in the amount of \$65M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$70M.

Operator anticipates the remaining cost for this project to be: \$ 0 \_\_\_\_\_

## 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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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.

All excavations will be backfilled to match the surrounding pad surface elevation.

Is the described reclamation complete? \_\_\_\_\_

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. \_\_\_\_\_

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 09/18/2025

Proposed site investigation commencement. \_\_\_\_\_

Proposed completion of site investigation. 09/18/2025

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. \_\_\_\_\_

Proposed date of completion of Remediation. \_\_\_\_\_

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

The partially buried vault identified by ECMC Facility ID 435587 is currently listed as Active in the COGIS database. However, it appears that the ECMC closed the remediation project (ECMC Remediation Project # 7997) associated with its removal on 12/10/2013 via ECMC Documents 2148109, 400552262, and 2148112.

Due to the fact that no groundwater was encountered during the assessments associated with this project and based on an estimated depth to groundwater at 200 feet below ground surface, QB requests that Table 915-1 RSSLs be used to evaluate the success of this project, as no reasonable pathway to groundwater appears to exist.

Assuming the proposed request is approved, arsenic and pH are the only constituent of concern detected exceeding Table 915-1 RSSLs. In order to address arsenic exceedances, QB Energy requests an alternative allowable limit of 10.5 mg/kg for arsenic per Table 915-1 Footnote 1. Analytical results of background samples collected as part of another project on an adjacent location called the PCU T73-11G (ECMC Location ID 315260) indicate a range of background arsenic concentrations from 2.93 mg/kg to 10.5 mg/kg. The arsenic concentration of all soil samples collected on 9/18/2025 falls within or below this range of background arsenic concentrations.

In order to address pH exceedances, QB Energy requests an alternative allowable limit of 9.37 for pH per Table 915-1 Footnote 1. Analytical results of background samples collected as part of another project on an adjacent location called the PCU T73-11G (ECMC Location ID 315260) indicate a range of background pH concentrations from 9.0 to 9.37. The pH measurement of all soil samples collected on 9/18/2025 falls below this range of background pH measurements.

Please see the attached investigation report and attached site map for details on these samples.

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

Signed: Jake Janicek

Title: EHS Specialist

Submit Date: 10/21/2025

Email: jjanicek@qb-energy.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: John Heil

Date: 11/24/2025

Remediation Project Number: \_\_\_\_\_

## COA Type

## Description

	Based on a review of the information provided, it appears that no further action is necessary at this time and ECMC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.
1 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

404397473	FORM 27-SUPPLEMENTAL-SUBMITTED
404397481	SITE INVESTIGATION REPORT
404397484	ANALYTICAL RESULTS
404397485	ANALYTICAL RESULTS
404397625	ANALYTICAL DATA SUMMARY TABLE(S)
404397633	ANALYTICAL RESULTS
404397980	MAP

Total Attach: 7 Files

## General Comments

## User Group

## Comment

## Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)