

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 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: CITATION OIL & GAS CORP	Operator No: 17180	Phone Numbers Phone: (281) 891-1550 Mobile: (713) 702-7534
Address: 14077 CUTTEN RD		
City: HOUSTON	State: TX	Zip: 77069
Contact Person: Bob Redweik	Email: bredweik@cogc.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40295 Initial Form 27 Document #: 404150880

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: WELL	Facility ID: _____	API #: 017-06728	County Name: CHEYENNE
Facility Name: ARAPAHOE UNIT 121(23-32)	Latitude: 38.788807	Longitude: -102.046582	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 31	Twp: 14S	Range: 41W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Agriculture crop 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

The closest water well is an irrigation well, approximately 0.36 miles northwest of the site, with a depth to water of 120 feet. There are no CPW HPH's or occupied buildings within a 1/4-mile radius of the site.

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
UNDETERMINED	SOILS	Unknown	Determine upon approval of Form 271 and sample results.

INITIAL ACTION SUMMARY

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

This form serves as notification of proposed soil sampling and investigation related to the decommissioned Arapahoe Unit 121 (23-32) wellhead. The ground and subsurface at the former surface location of the wellhead shall be inspected for hydrocarbon impacts. At a minimum, soil sampling shall be conducted in the proposed locations discussed below and shown on the attached proposed soil sample location maps and visual investigation areas.

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):

Three (3) discrete soil grab samples will be collected as shown in the proposed sample location diagram: one (1) adjacent to the capped well casing/wellhead, one (1) adjacent to the wellhead flowline riser, and one (1) from where the flowline riser enters the facility. Four (4) field screening surface soil samples will be collected in each cardinal direction surrounding the former wellhead and facility riser and field screened with a photo-ionization detector (PID). At least one (1) background sample will be collected from an adjacent, upgradient location. The grab samples will be analyzed for full Table 915-1 listed constituents. The background sample will be analyzed for EC, SAR, pH, boron, and metals.

Proposed Groundwater Sampling

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

Should groundwater be encountered, a sample will be collected as soon as practical and shall be submitted for laboratory analysis of Table 915-1 Inorganic Parameters and Organic Compounds in Groundwater.

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):

Based on pressure test results and review of aerial imagery (1993 to 2020) showing no evidence of spills or releases (e.g., staining or impacted cropland), visual investigation of the flowline corridor is warranted, and the entire flowline alignment will be visually assessed for signs of impact. If any soil staining, vegetation stress, or other indicators of releases are observed, additional soil samples will be collected from those suspect areas for laboratory analysis.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 _____
Vertical Extent > 915-1 (in feet) _____

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?

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.

Pending results of the site investigation.

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 activities for substantial impacts, if required, will likely involve the excavation of impaired soils for transport to an approved disposal facility. Following excavation and removal of any impacted soils, confirmation sampling will be conducted to confirm successful remediation. Excavated areas will then be backfilled with clean soil as necessary and seeding of the remediated area to re-establish a proper seedbed will be conducted.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

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 _____

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.

Citation carries general liability insurance of \$2,000,000, with excess liability insurance of \$35,000,000. Citation also carries pollution/waste liability insurance of \$20,000,000, and environmental related liability insurance of \$3,000,000 for all active wells and \$1,000,000 for all plugged and abandoned wells. Citation maintains \$1,135,000 in surety bonds with the COGCC. There is no site-specific financial assurance associated with this remediation project. Citation does not intend to file an insurance claim for this remediation project.

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

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

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.

A reclamation plan will be prepared pending the outcome of the site investigation.

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. _____

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

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 04/04/2025

Proposed completion of site investigation. 12/31/2025

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

Per the COA on Form 27 Supplemental Document # 404150880 and recent conversations or requests from the State, the approved Form 44, executed landowner agreement to abandon the line-in-place, and most recent passing pressure test are included as attachments. These documents in conjunction with the absence of a spill history associated with this flowline, provide justification for the implementation of a visual inspection of the flowline right-of way in lieu of the COA requested environmental investigation every 250 feet but which is NOT a regulatory requirement for this situation. In addition, Attachment C provides available historical aerial imagery of crops grown above the flowline and demonstrates no impacts to vegetation are present.

A discrete soil sample will be collected from the location where the flowline enters the facility and at the flowline riser adjacent to the former wellhead. Soil sample maps with the proposed soil sample locations are included as attachments.

The wellhead related to this project has been decommissioned and the Implementation Schedule for soil sampling/investigation has been updated. Field work activities will be summarized in a forthcoming Form 27 Supplemental.

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

Signed: Joel Mason

Title: Agent

Submit Date: 11/17/2025

Email: joel.mason@absarokasolutions.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: 12/10/2025

Remediation Project Number: 40295

COA Type

Description

	Operator shall provide a detailed cost estimate for site remediation on the next Form 27.
	Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. Quarterly updates shall include a current map of the subject location including current excavation limits and/or sample locations, proposed/actual soil boring locations and monitoring well locations. GPS data used to create the map must comply with ECMC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit field notes of all field activities reported during a Quarterly Update along with photo documentation.
	Operator shall continue Quarterly Reporting until the Site Assessment is completed, and the remediation area demonstrates Compliance with Full Table 915-1 Standards.
	Operator will submit a sample from an area of the well excavation exhibiting the highest degree of impact, or in the absence of apparent impacts, Operator will submit a sample from the base of the excavation adjacent to the Well along with photo logs of the excavation and surface areas.
	If groundwater is encountered, the Operator shall sample for Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to Organic Compounds.
	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)).
	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 AST and flowline. These areas include, but are not limited to; where Flowlines connect to the wellhead, surface equipment, risers, valves, separators 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. Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.
7 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.

<u>Att Doc Num</u>	<u>Name</u>
404417520	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404422026	OTHER
404436389	SOIL SAMPLE LOCATION MAP
404439332	AERIAL IMAGE
404468343	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Form 44 document no. 404320481 provided as attachment labeled as other, document no. 404439332	12/10/2025

Total: 1 comment(s)