

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404487140

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: HIGHPOINT OPERATING CORPORATION	Operator No: 10071	Phone Numbers Phone: (720) 315-8934 Mobile: ( )
Address: 555 17TH ST STE 3700		
City: DENVER State: CO Zip: 80202		
Contact Person: Luke Kelly	Email: Lkelly@Civiresources.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22792 Initial Form 27 Document #: 402993780

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: LOCATION Facility ID: 422932 API #: \_\_\_\_\_ County Name: WELD

Facility Name: Dutch Lake 09-11H Latitude: 40.495808 Longitude: -104.292014

\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_

QtrQtr: SESW Sec: 11 Twp: 6N Range: 62W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL Facility ID: \_\_\_\_\_ API #: 123-33450 County Name: WELD

Facility Name: Dutch Lake 09-11H Latitude: 40.495811 Longitude: -104.292017

\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_

QtrQtr: SESW Sec: 11 Twp: 6N Range: 62W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 491662 API #: \_\_\_\_\_ County Name: WELD  
Facility Name: Dutch Lake 9-11H Latitude: 40.495498 Longitude: -104.292443  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: SESW Sec: 11 Twp: 6N Range: 62W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Crop

Is domestic water well within 1/4 mile? Yes 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**

There is surface water within 1/4 of a mile. AN un-named stream is 795-ft to the SW.  
The Domestic Water Well (DWR Receipt # 0465983) approx 570-ft to the SE is the nearest permitted water well. This well was never constructed. The planned construction depth and static water level were not recorded. Domestic Well (DWR Receipt # 0465993, Permit 229379-) is approx 1120-ft to the SE. This well was constructed to 260-ft, with a static water level of 41-ft. Domesic Well (DWR Receipt # 396016, Permit 192916-) is approx 1275-ft to the SE. This well was constructed to 260-ft with a static water level of 51-ft.  
Groundwater less than 20 ft is not expected at the disturbance location.  
This location is within 1/4 mile of a HPH Pronghorn Winter Concentration 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.

\*12/29/2025 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 Dutch Lake 9-11H oil and gas location (422932) pertaining to the cut/cap of the Dutch Lake 9-11H wellhead (API: 05-123-33450), removal of all on-location flowlines, including wellhead line, and 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 investigative area to achieve horizontal and vertical delineation. Horizontal delineation is required north, east, south, and west of the documented arsenic exceedance soil sample location TB-SS-05@3'. Soil samples will be collected at 4' below ground surface (bgs) at soil sample location TB-SS-05@3' to achieve vertical delineation. Horizontal delineation samples will be collected at 3' bgs. 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 undisturbed locations.

### **Proposed Groundwater Sampling**

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

The nearest water well (Permit # 333972) with a recorded static water level is located approximately 750 feet northeast of the Dutch Lake 09-11H Pad. The recorded static water level of this well is 36 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.

### **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

NA / ND

Number of soil samples collected 6

-- Highest concentration of TPH (mg/kg) 40.5

Number of soil samples exceeding 915-1 1

-- Highest concentration of SAR 3.27

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

BTEX > 915-1 No

Approximate areal extent (square feet) 0

Vertical Extent > 915-1 (in feet) 0

**Groundwater**

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) \_\_\_\_\_

Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed \_\_\_\_\_

Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 \_\_\_\_\_

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?

Two background samples were collected for analysis of Table 915-1 metals, EC, SAR, pH, and boron.

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

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

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

\_\_\_\_\_ 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 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: \$ 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? \_\_\_\_\_

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 COGCC 1000 Series Rules. pH was within background concentrations.

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? No \_\_\_\_\_

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/03/2022

Proposed date of completion of Reclamation. 07/03/2023

## 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. 02/21/2022

Actual Spill or Release date, or date of discovery. 06/15/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/30/2026

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

Proposed completion of site investigation. \_\_\_\_\_

### 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:

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 #403284544) attached to ECMC Form 27 #403284515.

Sample ID 'TB-SS-05@3': The arsenic concentration of 5 mg/kg was altered to 2.29 mg/kg within the lab report (Origins # 206128-01) on pages 9 and 57.

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

The Highlighted Eagle file (Assessment Discrepancies - Highlighted) includes the Eagle report with the embedded original unsecured lab reports for reference only. Discrepancies have been highlighted for review, and the accurate data is reflected in standalone lab reports and summary tables.

This form is being submitted to satisfy the Q4 '25 quarterly update requirement. Civitas is currently waiting on the approval of the initial Form 27 (Doc # 404370941) that was submitted on 9/28/2025 which proposes our site assessment plan.

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: \_\_\_\_\_

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: \_\_\_\_\_

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

Remediation Project Number: 22792

**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**

404487194	SOIL SAMPLE LOCATION MAP
404487195	SITE INVESTIGATION PLAN
404487196	ANALYTICAL DATA SUMMARY TABLE(S)
404487198	ANALYTICAL RESULTS
404487199	SOIL SAMPLE LOCATION MAP
404487202	ANALYTICAL DATA SUMMARY TABLE(S)
404487203	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 7 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)