

**Form 27-S
Site Investigation Plan
Travis 1-10**

This Site Investigation Plan supports Form 27-S site decommissioning for the Travis 1-10 location (ID 483129). The location is operated by Navex Resources, LLC. The status of the Travis 1-10 location in the Energy & Carbon Management Commission (ECMC) COGIS database is closed (CL). The well is plugged and abandoned (PA).

The exploratory well at this location was drilled to 6,069 feet. The well was classified as dry. The well was plugged on May 7, 2023. It was cut and capped on May 9, 2023. The location had no production, surface equipment, or flowlines.

This Plan addresses the following two actions:

1. Request for a finding of No Further Action (NFA) for Remediation Project #31694
2. Request for approval of the Site Investigation Plan for location decommissioning

REQUEST FOR A FINDING OF NO FURTHER ACTION (REMEDIATION PROJECT #31694)

Remediation Project #31694 was assigned to Navex's 9/14/23 Form 27-I request to bury drill cuttings on site in a drill cuttings trench. Navex provided lab testing results per ECMC Table 915-1 and a remediation plan under Rule 915.b for elevated EC, SAR, and pH.

However, Navex never buried drill cuttings on site. Instead, Navex reported in a 10/17/25 Form 27-S that drill cuttings were hauled off site for disposal to the Kit Carson County landfill. Figure 1 shows that the Travis 1-10 location never had a drill cuttings pit or trench. Likewise, ECMC's 4/3/23 inspection report stated that there was no surface indication of a pit. During the time that drill cuttings were temporarily stored on site, they were managed using the following controls:



1. Drill cuttings were dewatered and dried to contain less than 5% moisture content.
2. Dewatering was performed with a Mammoth 2276 centrifuge.
3. Drying was further performed with shakers and double drying.
4. Dried cuttings were then contained on a liner. The lined area is shown in Figures 2 through 4.

Figure 1. ECMC 4/3/23 inspection showed and reported no surface indication of a pit



Figure 2. Demonstrates dried drill cuttings on liner (4/29/23)

Figure 3. Demonstrates dried drill cuttings still on liner (7/12/23)



Figure 4. Additional view of dried drill cuttings on liner (7/12/23)

In summary, ECMC requested the information below to support the finding of NFA for drill cuttings Remediation Project #31694, which Navex has provided.

- ECMC: Provide photo evidence to show the presence or absence of a drill cuttings trench on the location.
[Response: Photo 1 shows the absence of a drill cuttings trench, together with ECMC's corroboration during its 4/3/23 inspection of the location that there was no surface indication of a pit.](#)
- ECMC: Provide photos showing the location where exploration waste was stored.
[Response: Photos 2 through 4 show that dewatered and dried drill cuttings were stored on a liner on the well pad before the drill cuttings were hauled to the Kit Carson County landfill for disposal.](#)

SITE INVESTIGATION PLAN FOR LOCATION DECOMMISSIONING

The sections below describe the proposed Site Investigation Plan for decommissioning the Travis 1-10 location. The Plan conforms to ECMC guidance (January 4, 2021, March 8, 2021, September 20, 2021); the Wellhead Closure Checklist; ECMC's 12/5/25 Form 27-I Conditions of Approval; and ECMC's 12/23/25 conference call input to the operator.

1. Prior Approval

Submittal of this Plan complies with the Rule 913.b.(1) requirement to obtain Director's approval of the Site Investigation Plan.

2. Location and Number of Soil Samples

The exploratory well was classified as dry. It was plugged and abandoned after drilling. The location had no production equipment, vessels, tank battery, pits, trenches, or flowlines.

In accordance with Rule 913.b.(2) and ECMC input on 12/23/25, Navex will collect one discrete soil sample at the well. Absent production at the location, the wellhead is considered the area most likely to have been impacted, according to Rule 915.e.(2). ECMC guidance (September 20, 2021) instructs that the sample will be taken at the base of the excavation adjacent to the well.

Navex will collect one discrete soil sample representing background native soil conditions. The background sample will be in sufficiently outside of the well pad and area of disturbance to reflect conditions not impacted by oil and gas activity.

The attached figure shows the well and background sample locations. ECMC-compliant GIS shapefiles for the sample locations are filed in Webforms as an attachment to the Form 27-S.

3. Sample Collection

A qualified third-party will collect samples in accordance with Rule 915.e.(2) and ECMC guidance (April 27, 2021). Navex will first remove the 4 feet of clean fill overlaying the well to expose the area. The field technician then will conduct a photoionization detector (PID) reading of the area for potential volatile organic compounds. The technician will conduct field screening for visual and olfactory evidence of soil staining or contamination. A sample will be taken in the area where any impact is detected by PID, visually, or by smell. The sample will otherwise be taken adjacent to the well to be representative of the well area. The discrete sample will be at the base of the excavation and up to 6 inches deep. Navex will prepare a diagram illustrating the ground surface down to the sample collection depth. Navex will provide photo documentation for the excavation and sample location.

In accordance with direction provided by ECMC on 12/23/25, Navex will also remove 4 feet of overlaying soil from the background sample location. This provides a like-for-like comparison of soil horizons and lithology. Navex will diagram and photograph the background sample location.

4. Analytes

Each soil sample will be analyzed for constituents in Table 915-1. They are:

TPH C6-C36	Boron (hot water soluble soil extract)
EC (saturated paste method)	Organic compounds in soils
SAR (saturated paste method)	Metals in soils
pH (saturated paste method)	

5. Certified Lab

Samples will be analyzed by a NELAP-certified lab. Collection and analysis will be compliant with requirements for collection method, containers, sample preservation and ice, chain of custody, and holding times.

6. Sample Results

Lab results will be digitally certified, in accordance with ECMC requirements. Navex will provide the following site investigation results, filed with a Form 27-S:

- Scaled map showing the final sample locations and coordinates
- Table format for sample results
- Field screening results
- PID reading
- Diagrams of sample depths relative to the surface
- Photo logs of the excavations and surface areas
- Field notes

7. Groundwater

The estimated depth to the shallowest groundwater in this area is expected to be approximately 150 feet deep. The information is derived from Division of Water Resources data for well No. 195825 at <https://dwr.state.co.us/Tools/WellPermits/0401235>. Groundwater is unlikely to be encountered during soil sampling. If groundwater is encountered, Navex will sample for Table 915-1 constituents for groundwater.

8. High Priority Habitat and Receptors

There is no high priority habitat (HPH) or sensitive receptors within 0.25 miles of the location. On 3/28/22, Colorado Parks & Wildlife concluded that a former raptor nest approximately 0.3 miles east of the location was destroyed and no longer considered present. The nearest water well, spring, seep, or downgradient surface water are all greater than 2,640 feet from the location. The nearest residential building unit is greater than 5,280 feet from the location.

9. Impacted Soils

If there is a discovery of a spill or release during the site investigation, Navex will report it using Form 19, per Rule 912.b. Impacted soil will be managed as oily waste. It will be segregated for proper offsite disposal and the lateral and vertical extent of contamination, together with total volume (cubic yards), will be determined through confirmation soil sampling.

10. Schedule

In accordance with Rule 913.d, Navex anticipates the following schedule:

- January 2026 – Submit Form 27-S with this Site Investigation Plan
- February 2026 – ECMC review
- March 2026 – Landowner notification and Navex site investigation
- April 2026 – Submit Form 27-S with site investigation results
- Quarterly updates, if necessary, based on site investigation findings