

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Krystal Heibel

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>OWN RESOURCES OPERATING LLC</u>	Operator No: <u>10699</u>	Phone Numbers
Address: <u>305 S RIDGE STREET #6279</u>		
City: <u>BRECKENRIDGE</u>	State: <u>CO</u>	Zip: <u>80424</u>
Contact Person: <u>Niels Phaf</u>	Email: <u>niels.phaf@ownresources.com</u>	Phone: <u>(970) 332-3585</u>
		Mobile: <u>(713) 628-7339</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29414 Initial Form 27 Document #: 403280781

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>WELL</u>	Facility ID: _____	API #: <u>125-07605</u>	County Name: <u>YUMA</u>
Facility Name: <u>ROCKWELL 32-15</u>	Latitude: <u>40.054040</u>	Longitude: <u>-102.385020</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>15</u>	Twp: <u>1N</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>303866</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>ROCKWELL-61N45W 15SWNE</u>	Latitude: <u>40.054040</u>	Longitude: <u>-102.385020</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>15</u>	Twp: <u>1N</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use non crop

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

A livestock well approximately 1959 feet north, water dept < 106, Mule Deer severe winter range, work approved by Brandon Murette by phone. Location is in designated groundwater management area and designated basin, no visible wetlands near.

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 type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input 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	Medium	Soil Analysis

INITIAL ACTION SUMMARY

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

No initial action or emergency response measures taken, this was for a planned P&A. Scope of Work: Wellhead, meter shed, on location gas line was removed completely, water line riser was removed and water line capped due to water line being connected upstream to Rockwell 33-15. Gas gathering line was cut and capped at on 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):

A total of 2 Soil samples were collected-One from the wellhead and a background 112 feet north of the wellhead. Soil screening was performed along both excavation walls, within each quadrant of the excavation, and at the base of the excavation. An environmental assessment was also conducted along the length of the flowline. No visual staining, dead vegetation, or other signs of previous impacts were observed. Field screening results did not indicate elevated readings; therefore, no further soil sampling was needed. Updated soil location map is uploaded in attachments. All samples were analyzed to full Table 915-1. One additional sample was collected in July and analyzed only for soil suitability and it will be used to complete the rest of the

Proposed Groundwater Sampling

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

No groundwater encountered during excavation

Proposed Surface Water Sampling

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

No surface water encountered

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 1

Number of soil samples exceeding 915-1 1

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 19.1

Was the areal and vertical extent of soil contamination delineated? Yes _____

BTEX > 915-1 No _____

Approximate areal extent (square feet) 1257 _____

Vertical Extent > 915-1 (in feet) 1 _____

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?

A background sample was collected from undisturbed native soil and analyzed for full table 915. This sample will be used as the baseline for the remainder of this remediation project. Results show elevated arsenic at 1.07

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? Yes _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Analytical results shows elevated SAR, pH on the most recent sample. These sources will be addressed though in-place treatment. Elevated level at the wellhead for SAR (19.1), pH (8.71).

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 of Existing Impacts – The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area. Beyond the selected remediation approaches we will also apply "Soft Soil" for soil conditioning and perform mechanical de-compaction to promote water infiltration. Use of Soil Amendments:
1. SAR- elevated at the wellhead- a targeted application of Reclaim will be used to displace and reduce SAR to acceptable levels
2. pH- elevated at at the wellhead - sulfur will be applied to lower the pH and rebalance the soil's chemical properties.
3. Arsenic - NFA - Arsenic levels measured at 0.867 mg/kg are below the local background concentration of 1.07 mg/kg. As this appears to be naturally occurring and consistent with regional conditions, we are requesting No Further Action for arsenic.

Implementation of the remedial actions is scheduled for fall– 2025.

One confirmation sample will be collected and analyzed in Q3 2026 to assess soil suitability, evaluate the effectiveness of remediation efforts, and determine compliance with Table 915-1 standards.

Soil Remediation Summary

In Situ

Ex Situ

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

_____ 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.

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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

In April 2023, the site was regraded to match the surrounding topography and promote proper drainage. The area was decompacted, seeded with an approved native pastureland seed mix, and straw was crimped into the surface to aid in moisture retention.

A visual inspection conducted in June 2025, the site shows early regrowth of native grasses, with vegetation ranging from sparse to moderate across the site. Some surface crusting and patchy cover were noted, likely due to residual soil compaction. However, plant density is improving, particularly along the outer areas, indicating gradual vegetative recovery. Site conditions and vegetative progress are documented in the attached photobook.

The operator will continue to monitor the site, and any noxious weeds will be managed using appropriate control measures. All reclamation activities are being conducted in accordance with ECMC Rule 1003.

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? No _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? Yes _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 05/29/2023

Proposed date of completion of Reclamation. 07/31/2027

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. 12/05/2022

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/29/2023

Proposed site investigation commencement. 05/29/2023

Proposed completion of site investigation. 07/07/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/15/2023

Proposed date of completion of Remediation. 06/30/2026

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:

Analytical results and recent site inspection gave an updated approach.

OPERATOR COMMENT

DOA's from Doc#403280781 are addressed as follows:

1. No groundwater was encountered during in any of the two excavations.
2. An environmental assessment was conducted along the length of the flowline, and no visual evidence of staining, dead vegetation or previous impacts identified.

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

Signed: Azucena Torres

Title: Remediation & Reclamation

Submit Date: 08/14/2025

Email: azucena.torres@ownresources.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: Krystal Heibel

Date: 01/15/2026

Remediation Project Number: 29414

COA Type

Description

	<p>The samples collected on June 15, 2023, within document 404252638, were not preserved properly. Laboratory analytical report indicates that soil samples were delivered to the laboratory outside of the required temperature preservation range. Operator shall collect confirmation samples for laboratory analysis of Table 915-1 Soil TPH (C6-C36), organic compounds in soils, and hexavalent chromium and comply with lab standards for delivery.</p> <p>The samples collected on July 21, 2025, document 404304665, were properly preserved, but only Table 915-1 Soil Suitability Analytes were sampled for. Operator shall collect sample(s), preserve them properly, and analyze them for every analyte within Table 915-1 to ensure remediation is complete at this location.</p>
	<p>Operator has failed to maintain quarterly reporting. This Form 27-Supplemental was submitted August 14, 2025, and an updated Form 27 Supplemental was due no later than November 12, 2025 (90 days later). At the day of this review (January 15, 2026), the Form 27 Supplemental is 64 days delinquent. The operator shall submit a Form 27 Supplemental explaining the current state of this remediation and actionable dates to progress the remediation within 14 days of this approval.</p>
	<p>If analytics indicate that the Soil Suitability for Reclamation analytes (pH, SAR, EC, and/or boron) have not improved after a year of the current reclamation techniques, then the Operator shall provide an alternative, more aggressive, remediation plan.</p>
	<p>Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.</p> <p>Operator shall submit a Soil Sample Location Map that shows the location of each soil sample location and the location(s) of all field screening locations.</p>
	<p>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 flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, 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.</p>

5 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.

Att Doc Num

Name

404248559	FORM 27-SUPPLEMENTAL-SUBMITTED
404252634	ANALYTICAL DATA SUMMARY TABLE(S)
404252635	PHOTO DOCUMENTATION

404252637	SOIL SAMPLE LOCATION MAP
404252638	ANALYTICAL RESULTS
404304665	ANALYTICAL RESULTS
404304667	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 7 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>"Remediation of Existing Impacts – The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area. Beyond the selected remediation approaches we will also apply "Soft Soil" for soil conditioning and perform mechanical de-compaction to promote water infiltration. Use of Soil Amendments:</p> <ol style="list-style-type: none"> 1. SAR- elevated at the wellhead- a targeted application of Reclaim will be used to displace and reduce SAR to acceptable levels 2. pH- elevated at at the wellhead - sulfur will be applied to lower the pH and rebalance the soil's chemical properties. 3. Arsenic - NFA - Arsenic levels measured at 0.867 mg/kg are below the local background concentration of 1.07 mg/kg. As this appears to be naturally occurring and consistent with regional conditions, we are requesting No Further Action for arsenic. <p>Implementation of the remedial actions is scheduled for fall– 2025.</p> <p>One confirmation sample will be collected and analyzed in Q3 2026 to assess soil suitability, evaluate the effectiveness of remediation efforts, and determine compliance with Table 915-1 standards."</p>	01/15/2026
Environmental	<p>"All samples were analyzed to full Table 915-1. One additional sample was collected in July and analyzed only for soil suitability and it will be used to complete the rest of this form."</p>	01/15/2026

Total: 2 comment(s)