

State of Colorado
Energy & Carbon Management Commission

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404391162
Receive Date:
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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 Phone: <u>(970) 332-3585</u> Mobile: <u>()</u>
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>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39513 Initial Form 27 Document #: 404119046

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>125-07707</u>	County Name: <u>YUMA</u>
Facility Name: <u>MOELLENBERG 42-31</u>	Latitude: <u>39.668093</u>	Longitude: <u>-102.218065</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>31</u>	Twp: <u>4S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>303945</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>MOELLENBERG-64S43W 31SENE</u>	Latitude: <u>39.668093</u>	Longitude: <u>-102.218065</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>31</u>	Twp: <u>4S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications ML

Most Sensitive Adjacent Land Use Pasture

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

Potential Receptors: A livestock well approximately 2220' west, groundwater depth >150', designated groundwater management area, designated basin, Intermittent stream approximately 1620' west, no high priority habitat. No visible wetlands present.

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	Field Screening & 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 required and/or taken, this Form 271 is for a planned P & A, Scope: wellhead at location 303945, meter shed, produced water tank, partial in place abandonment of gas gathering (Form 44 for partial gathering abandonment will be created and tagged in the next Form 27S).

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 5 samples were collected: one from the wellhead, one from gas disconnect, one from the tank inlet, one from the gas gathering disconnect, and a background 88 feet away from the wellhead. Visual field screenings were conducted at the well site, under the tank, at the meter shed location and along the gas flowline line. Also field screening was done at the three excavations, covering each wall and floor quadrant. A pressure test was performed with no negative readings. Based on field screening, excavation screening, and pressure test results, no further sampling was needed. All samples will be analyzed according to the full Table 915-1.

Proposed Groundwater Sampling

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

Groundwater was not encountered during excavations, water depth >150'

Proposed Surface Water Sampling

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

No surface water in the area was observed.

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 5

-- Highest concentration of TPH (mg/kg) 143

Number of soil samples exceeding 915-1 5

-- Highest concentration of SAR 24.9

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

BTEX > 915-1 No _____

Approximate areal extent (square feet) 8585 _____

Vertical Extent > 915-1 (in feet) 4 _____

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 an undisturbed area to use as a baseline for Table 915 reclamation standards.

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.

Soil analysis from Summit Scientific shows levels exceeded table 915-1 on EC, SAR, pH, boron, and arsenic. Elevated sources will be treated in place with the exception of arsenic. Arsenic is elevated in all areas including background, which gives an indication that levels exists in native soils in the area.

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 – We will focus our efforts on improving soil structure, natural attenuation, and applying soil amendments to address elevated contaminant levels. The selected remedial methods are recommendations from a local agronomist and are appropriate for the soils in the area.
Use of Soil Amendments:
1. EC and SAR- Application of Reclaim and Gypsum to mitigate reduce elevated levels.
2. pH- Application of sulfur to reduce pH levels and rebalance soil chemistry.
3. Boron-Soil conditioning and de-compaction will involve incorporating Soft Soil to improve soil structure, followed by mechanical de-compaction to promote water infiltration.
4. Arsenic- Arsenic concentrations exceeded levels in all samples, the presence of elevated arsenic in the background sample indicates it is naturally occurring in the area. Therefore, arsenic-specific remediation is not proposed at this time. no further action (NFA).

In Q3 2026, a confirmation samples will be collected from the wellhead and tank inlet, samples will be analyzed to soil suitability for reclamation. Background sample will be analyzed to 8260 to obtain results that are within the correct holding time.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

Chemical oxidation
 Air sparge / Soil vapor extraction
 Yes Natural Attenuation
 Yes Other Reclaim, Gypsum, Sulfur and Soft Soil _____

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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs. We also have an approved assurance plan under option 5.

Operator anticipates the remaining cost for this project to be: \$ 500 _____

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.

The well pad and all associated disturbed areas were re-contoured to closely match the original pre-disturbance grade and surrounding area. Grading was completed in a manner that promotes proper drainage. To restore soil health and support revegetation, compaction alleviation was conducted as needed. Seeding will occur during the first favorable season after recontouring and de-compaction, using an approved native pastureland seed mix. Straw will be crimped to retain moisture, and noxious weeds will be managed with appropriate control measures. Reclamation will be completed in accordance with Rule 1003 and applicable to surface owner agreement.

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. 04/03/2025

Proposed date of completion of Reclamation. 04/30/2027

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. 02/24/2025

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/03/2025

Proposed site investigation commencement. 05/14/2025

Proposed completion of site investigation. 05/19/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/03/2025

Proposed date of completion of Remediation. 06/01/2026

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:

OPERATOR COMMENT

COA's from Doc# 404119046 are addressed as follows:

1. Soil samples were collected and shipped to lab with ice. According to lab sample checklist samples arrived at 3.0C

Note: During the initial sampling event, the 8260 analysis for the background sample failed internal standards (under range) due to an instrument malfunction. The laboratory subsequently re-analyzed the sample outside of the prescribed holding time to obtain valid results; additional details are provided in the lab narrative within the analytical report.

A new background sample will be collected during the confirmation sampling event and analyzed to 8260 to obtain results that are within the correct holding time.

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: 12/11/2025

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: 01/20/2026

Remediation Project Number: 39513

COA Type**Description**

	If a spill/release of produced fluids or E&P waste causes an impact from inorganic constituents to soil, the operator should perform sampling and analysis to fully delineate the lateral and vertical extent of those impacts.
	Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.
2 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**

404391162	FORM 27-SUPPLEMENTAL-SUBMITTED
404391364	ANALYTICAL RESULTS
404421937	ANALYTICAL DATA SUMMARY TABLE(S)
404424726	SOIL SAMPLE LOCATION MAP
404424727	SOIL SAMPLE LOCATION MAP
404424728	SOIL SAMPLE LOCATION MAP
404454301	PHOTO DOCUMENTATION

Total Attach: 7 Files

General Comments**User Group****Comment****Comment Date**

Environmental	"COA's from Doc# 404119046 are addressed as follows: 1. Soil samples were collected and shipped to lab with ice. According to lab sample checklist samples arrived at 3.0C Note: During the initial sampling event, the 8260 analysis for the background sample failed internal standards (under range) due to an instrument malfunction. The laboratory subsequently re-analyzed the sample outside of the prescribed holding time to obtain valid results; additional details are provided in the lab narrative within the analytical report. A new background sample will be collected during the confirmation sampling event and analyzed to 8260 to obtain results that are within the correct holding time."	01/20/2026
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Total: 1 comment(s)