FORM
19
Rev 03/21

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number: 404508862
Date Received: 01/17/2026

SPILL/RELEASE REPORT (INITIAL /w SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to ECMC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

Spill report taken by: Ahmadian, Alexander

Spill/Release Point ID: 492897

OPERATOR INFORMATON

Name of Operator: AXIS EXPLORATION LLC Operator No: 10646

Address: 555 17TH STREET SUITE 3700

City: DENVER State: CO Zip: 80202

Contact Person: Seth Robinson

Phone Numbers

Phone: (907) 888-6089

Mobile: ( )

Email: srobinson@civiresources.com

☐ Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 404508862

Initial Report Date: 01/16/2026 Date of Discovery: 01/15/2026 Spill Type: Historical Release

Spill/Release Point Location:

QTRQTR SWSW SEC 15 TWP 5S RNG 63W MERIDIAN 6

Latitude: 39.609204 Longitude: -104.433186

Municipality (if within municipal boundaries): N/A County: ARAPAHOE

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

☐ Check this box if this spill/release is related to a loss of integrity of a flowline, pipeline, crude oil transfer line, or produced water transfer line.

Reference Location:

Facility Type: OFF-LOCATION FLOWLINE

Spill/Release Point Name: Freund 14-15

☒ Facility/Location ID No 461315

☐ Well API No. (Only if the reference facility is well) 05- -

☐ No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): Unknown Estimated Condensate Spill Volume(bbl): Unknown

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): Unknown

Estimated Other E&P Waste Spill Volume(bbl): 0 Estimated Drilling Fluid Spill Volume(bbl): 0

Specify:

Has the subject Spill/Release been controlled at the time of reporting? Yes

Land Use:

Current Land Use: OTHER Other(Specify): Rangeland

Weather Condition: Sunny, 50s

Surface Owner: FEE Other(Specify):

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

Location is within a HPH Pronghorn winter concentration area and Mule deer migration corridor.
Surface Waters of the State within 300': Not applicable.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
1/16/2026	CPW	Lexi Hamous-Miller	313-916-2987	Notified of Release
1/15/2026	CPW	Brandon Marette	303-297-7327	Notified of Release
1/16/2026	Arapahoe County	Martin Lohmann	720-874-6500	Notified of Release
1/16/2026	Surface Owner	On File	-On File	Notified of Release
1/15/2026	ECMC	Alexander Ahmadian	720-926-6817	Notified of Release

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

No Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: _____ Public Water System: _____

Residence or Occupied Structure: _____ Livestock: _____

Wildlife: _____ Publicly-Maintained Road: _____

No Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery _____(HH:MM)

Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 _____

Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? _____

Enter the Document Number of the Initial Accident Report, Form 22 _____

Was there damage during excavation? _____

Was CO 811 notified prior to excavation? _____

No Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): _____

No — Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:

- ☐ The presence of free product or hydrocarbon sheen Surface Water
- ☐ The presence of free product or hydrocarbon sheen on Groundwater
- ☐ The presence of contaminated soil in contact with Groundwater
- ☐ The presence of contaminated soil in contact with Surface water

Yes — Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylights from the subsurface.

No — Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.

☐ Areas offsite of Oil & Gas Location ☐ Off-Location Flowline right of way

No — Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.

No — Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

SPILL/RELEASE DETAIL REPORTS

#1 Supplemental Report Date: 01/16/2026

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL			☒
CONDENSATE			☒
PRODUCED WATER			☒
DRILLING FLUID	0	0	☐
FLOW BACK FLUID	0	0	☐
OTHER E&P WASTE	0	0	☐

specify:

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

*Secondary containment, **including walls & floor regardless of construction material**, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.*

A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit

Impacted Media (Check all that apply) ☒ Soil ☐ Groundwater ☐ Surface Water ☐ Dry Drainage Feature

Surface Area Impacted: Length of Impact (feet): 10 Width of Impact (feet): 10

Depth of Impact (feet BGS): 5 Depth of Impact (inches BGS):

How was extent determined?

The extent was determined through confirmation soil sampling during site assessment/excavation activities.

Soil/Geology Description:

Silty sand is located near the surface. Water Well: Domestic Stock (Permit 233640-, Receipt 0476389) is located 895 feet to the SSW, and is the nearest permitted water well. This well was constructed to 515 feet below ground surface (bgs). Static water level was measured at 190 feet bgs. The lithology logged in the well includes an impermeable shale layer from 23 to 140 feet bgs. Clay was also logged along with some sand from 2 to 23 feet bgs. Based on this information, Axis Exploration requests that Residential Soil Screening Levels (RSSLs) apply to this site because there is no apparent pathway to groundwater. The well construction log is attached to this Form 19.

Depth to Groundwater (feet BGS) 190 Number Water Wells within 1/2 mile radius: 4

If less than 1 mile, distance in feet to nearest Water Well 895 None ☐ Surface Water 1452 None ☐

Wetlands 1452 None ☐ Springs None ☒

☒ ☐

Livestock _____ None Occupied Building 1695 None

Additional Spill Details Not Provided Above:

• Wetland: “Riverine” type approximately 1,452 feet to the W of the spill location.
• Surface Water: Kiowa Creek approximately 1,452 feet to the W of the spill location

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 01/09/2026

Root Cause of Spill/Release Unknown (Historical)

Other (specify)

Type of Equipment at Point of Spill/Release: Other

If “Other” selected above, specify or describe here:

Flowline at wellhead

Describe Incident & Root Cause (include specific equipment and point of failure)

During decommissioning activities at the Axis Exploration's Freund 14-15 flowline (wellhead), historical impacts were identified from analytical soil sample results.

Describe measures taken to prevent the problem(s) from reoccurring:

Lease operators are trained to perform routine AVO inspections at all oil and gas facilities.

Volume of Soil Excavated (cubic yards): _____

Disposition of Excavated Soil (attach documentation) ☐ Offsite Disposal Onsite Treatment

☐ Other (specify)

Volume of Impacted Ground Water Removed (bbls): _____

Volume of Impacted Surface Water Removed (bbls): _____

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure:

☐ Corrective Actions Completed (documentation attached, check all that apply)

☐ Horizontal and Vertical extents of impacts have been delineated.

☐ Documentation of compliance with Table 915-1 is attached.

☐ All E&P Waste has been properly treated or disposed.

☒ Work proceeding under an approved Form 27 (Rule 912.c).

Form 27 Remediation Project No: 42681

☐ SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

OPERATOR COMMENTS:

Silty sand is located near the surface. Water Well: Domestic Stock (Permit 233640-, Receipt 0476389) is located 895 feet to the SSW, and is the nearest permitted water well. This well was constructed to 515 feet bgs. Static water level was measured at 190 feet bgs. The lithology logged in the well includes an impermeable shale layer from 23 to 140 feet bgs. Clay was also logged along with some sand from 2 to 23 feet bgs. Based on this information, Axis Exploration requests that Residential Soil Screening Levels (RSSLs) apply to this site because there is no apparent pathway to groundwater. The well construction log is attached to this Form 19.

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

Signed: Print Name: Seth Robinson

Title: Senior Env Specialist Date: 01/17/2026 Email: srobinson@civiresources.com

COA Type	Description
	Quarterly reporting (90 days) is required under Remediation Project #42681. Operator shall include the Spill ID associated with this form on the subsequent Supplemental Form 27 and select Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912 in addition to the previous Rule selection.
	Based on the information provided and known depth to water at the site, ECMC agrees to the use of Table 915-1 Residential Soil Screening Level Concentrations.
2 COAs	

ATTACHMENT LIST

Att Doc Num	Name
404508862	SPILL/RELEASE REPORT(I/S)
404510187	OTHER
404510188	LABORATORY ANALYTICAL REPORT
404510189	OTHER
404518871	FORM 19 SUBMITTED

Total Attach: 5 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)