

**State of Colorado**  
**Energy & Carbon Management Commission**

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Document Number:  
404495501

Receive Date:  
01/06/2026

Report taken by:  
KRIS NEIDEL

**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>ROBERT L BAYLESS PRODUCER LLC</u> | Operator No: <u>6720</u>              | <b>Phone Numbers</b>          |
| Address: <u>707 17TH STREET SUITE 2975</u>             |                                       | Phone: <u>(303) 382-0906</u>  |
| City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u> |                                       | Mobile: <u>(720) 338-3639</u> |
| Contact Person: <u>Nathan Denzin</u>                   | Email: <u>notices@bayless-cos.com</u> |                               |

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 30484 Initial Form 27 Document #: 403436324

**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: Rule 911. Closure of oil and gas facilities

**SITE INFORMATION**

Yes  Multiple Facilities

|  |                            |                               |   |
|--|----------------------------|-------------------------------|---|
| Facility Type: <u>PIT</u>                      | Facility ID: <u>117433</u> | API #: _____                  | County Name: <u>ROUTT</u>                                       |
| Facility Name: <u>EITLES-BRADLEY 1-14</u>      | Latitude: <u>40.482962</u> | Longitude: <u>-107.110704</u> |   |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |   |
| QtrQtr: <u>NENE</u>                            | Sec: <u>14</u>             | Twp: <u>6N</u>                | Range: <u>87W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

|  |                            |                               |   |
|--|----------------------------|-------------------------------|---|
| Facility Type: <u>WELL</u>                     | Facility ID: _____         | API #: <u>107-06142</u>       | County Name: <u>ROUTT</u>                                       |
| Facility Name: <u>EILTS-BRADLEY 1-14</u>       | Latitude: <u>40.482740</u> | Longitude: <u>-107.111020</u> |   |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |   |
| QtrQtr: <u>NENE</u>                            | Sec: <u>14</u>             | Twp: <u>6N</u>                | Range: <u>87W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

Facility Type: LOCATION Facility ID: 316765 API #: County Name: ROUTT  
Facility Name: EILTS-BRADLEY-66N87W 14NENE Latitude: 40.482651 Longitude: -107.111035  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: NENE Sec: 14 Twp: 6N Range: 87W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use location on private ranch  
Is domestic water well within 1/4 mile? No 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**

Yampa River is approximately 762 feet to the northwest directly downhill of the wellsite.

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- E&P Waste       Other E&P Waste       Non-E&P Waste
- Produced Water       Workover Fluids
- Oil       Tank Bottoms
- Condensate       Pigging Waste
- Drilling Fluids       Rig Wash
- Drill Cuttings       Spent Filters
- Pit Bottoms
- Other (as described by EPA)

## DESCRIPTION OF IMPACT

| Impacted? | Impacted Media | Extent of Impact | How Determined |
|-----------|----------------|------------------|----------------|
| Yes       | SOILS          | UNDETERMINED     | Soil Sampling  |

## INITIAL ACTION SUMMARY

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

Please refer to the Energy Carbon and Management Commission (ECMC) Document Numbers (DN) 403794171 and 403956047 for initial facility plug and abandonment activities, decommissioning, and other activities completed. Please reference Remediation Project Number (RPN) 30484 for activities completed to date associated with this project.

The proposed sampling plan as it related to investigative soil borings as described in ECMC DN 404132400 was completed in the third quarter (Q3) of 2025. 1x to 2x discreet samples from each boring were taken and tested as described in ECMC DN 404132400.

No work was completed in forth quarter (Q4) of 2025.

## 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 ):

RL Bayless plans to advance up to 14 investigative soil borings within and surrounding the former wellhead, tank battery, and production pit footprints to vertically and laterally define previously reported impacts. One soil boring will be advanced at each of the centers of the historic wellhead and tank battery footprints, and three will be advanced in each cardinal direction of the tank battery and wellhead footprints. One boring will be advanced east between the production well and west tank battery footprints, bringing the total soil boring locations for the tank battery and wellhead footprints to nine. One soil boring will be advanced in the upgradient production pit location, and four more soil borings will be advanced in each cardinal direction of the production pit location, bringing the total soil boring locations for the production pit footprint to five (5).

### Proposed Groundwater Sampling

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

Encountering groundwater is not anticipated at this time. If at any point in this remediation process groundwater is encountered, it will be sampled for Table 915-1 constituents, reported, and the project parameters will be reevaluated to incorporate groundwater considerations.

### 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 ):

Please see the "Proposed Soil Sampling" and "Operator Comments" Sections for these details.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 23  
Number of soil samples exceeding 915-1 23  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 15000

**NA / ND**

-- Highest concentration of TPH (mg/kg) 2409  
-- Highest concentration of SAR 1.45  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 17

**Groundwater**

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) \_\_\_\_\_  
Number of groundwater monitoring wells installed \_\_\_\_\_  
Number of groundwater samples exceeding 915-1 \_\_\_\_\_

ND Highest concentration of Benzene (µg/l) \_\_\_\_\_  
ND Highest concentration of Toluene (µg/l) \_\_\_\_\_  
ND Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
ND Highest concentration of Xylene (µg/l) \_\_\_\_\_  
ND 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?

In accordance with ECOM Rule 915e.(2)D., three background samples were collected from nearby off-pad locations, one background was taken approximately 125 feet southwest of the tank battery footprint, one background was taken approximately 75 feet south of the tank battery footprint, and one background was taken approximately 50 feet south of the production pit footprint. The sampling information can be referenced in DN 403794171.

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?

Please see the "Proposed Soil Sampling" and "Operator Comments" sections for these details.

**REMEDIAL ACTION PLAN**

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

The sources (production equipment) have since been removed.

**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 soil boring, soil sampling, and delineation activities of Elites Bradley 1-14 Site is achieved a remediation plan will be presented to the ECOM.

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

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**

No Bioremediation ( or enhanced bioremediation )  
 No Chemical oxidation  
 No Air sparge / Soil vapor extraction  
 No Natural Attenuation  
 No 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.



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 Plan was proposed in submittal of Form 27 Doc# 403550560. The reclamation will proceed only after resolution of REM# 30484. Any excavation occurring during remediation will be backfilled

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? \_\_\_\_\_

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

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 08/04/2025

Proposed date of completion of Reclamation. 08/25/2025

## 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. \_\_\_\_\_

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/05/2023

Proposed site investigation commencement. 06/26/2023

Proposed completion of site investigation. 06/16/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/25/2025

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:

\_\_\_\_\_

**OPERATOR COMMENT**

This serves as our quarterly supplemental Form 27 for this project. No work was conducted in the forth quarter (Q4) of 2025.

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

Signed: Nathan Denzin

Title: Engineering Manager

Submit Date: 01/06/2026

Email: ndenzin@bayless-cos.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: KRIS NEIDEL

Date: 02/17/2026

Remediation Project Number: 30484

**COA Type****Description**

| 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**

| Att Doc Num | Name                           |
|-------------|--------------------------------|
| 404495501   | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 1 Files

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

| User Group    | Comment  | Comment Date |
|---------------|--|--------------|
| Environmental | This form was approved to demonstrate the operator's compliance with reporting requirements. No changes were either approved or requested. | 02/17/2026   |

Total: 1 comment(s)