

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Alexander Ahmadian

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>AXIS EXPLORATION LLC</u>	Operator No: <u>10646</u>	Phone Numbers
Address: <u>555 17TH STREET SUITE 3700</u>	Phone: <u>(907) 888-6089</u>	
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Mobile: <u>()</u>	
Contact Person: <u>Seth Robinson</u>	Email: <u>srobinson@civiresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34816 Initial Form 27 Document #: 403739219

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>039-06626</u>	County Name: <u>ELBERT</u>
Facility Name: <u>HSR-MARRS 3-10</u>	Latitude: <u>39.547358</u>	Longitude: <u>-104.322008</u>	
** correct Lat/Long if needed: Latitude: <u>39.547623</u>		Longitude: <u>-104.321750</u>	
QtrQtr: <u>NENW</u>	Sec: <u>10</u>	Twp: <u>6S</u>	Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>322207</u>	API #: _____	County Name: <u>ELBERT</u>
Facility Name: <u>HSR-MARRS-66S62W 10NENW</u>	Latitude: <u>39.547677</u>	Longitude: <u>-104.321691</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>10</u>	Twp: <u>6S</u>	Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: SPILL OR RELEASE Facility ID: 486739 API #: _____ County Name: ELBERT
Facility Name: HSR Marrs 66S62W 10 NENW Latitude: 39.547520 Longitude: -104.321913
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 10 Twp: 6S Range: 62W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use Rangeland

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

No surface water within 1/4 of a mile.
No water wells within 1/4 of a mile.
Groundwater less than 20 ft is not expected at the disturbance location.
This location is not within a HPH area. CPW consultation not required.

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 checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" 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
UNDETERMINED	GROUNDWATER	NA	Laboratory Analytical if Encountered
Yes	SOILS	180' X 80' X 3' bgs	Laboratory Analytical

INITIAL ACTION SUMMARY

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

A site investigation will be conducted pursuant to COGCC rule 911 at the HSR-MARRS-66S62W 10NENW (322207) oil and gas location pertaining to the cut/cap of the HSR-MARRS 3-10 (05-039-06626), decommission of production facilities and abandonment of all on-location flowlines. See site map exhibit for details.

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):

Fifteen grab soil samples were collected at the tank battery area and three composite soil samples were collected from the stockpiled overburden. All soil samples were submitted to a certified laboratory for analysis of Table 915-1 metals and organic compounds in soil, TPH C6-36, EC, SAR, pH, and boron.

Proposed Groundwater Sampling

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

If groundwater is encountered during excavation activities, a grab sample will be collected and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, sulfates, chlorides, and TDS.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 18

-- Highest concentration of TPH (mg/kg) 8587

Number of soil samples exceeding 915-1 18

-- Highest concentration of SAR 2.16

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 Yes

Approximate areal extent (square feet) 14400

Vertical Extent > 915-1 (in feet) 3

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?

Ten (10) background soil samples were collected from homogenous soil horizons and/or corresponding excavation confirmation soil sample depths.

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? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The source is currently being removed through mechanical excavation. Grab soil samples will be collected to determine the vertical and lateral extent of impacts. Soil samples will be submitted to a certified laboratory for analysis of Table 915-1 metals and organic compounds in soil, TPH C6-36, EC, SAR, pH, and boron.

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.

Subsequent to source removal, the estimated timeframe to achieve a no further action will be April 30, 2026.

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

 Chemical oxidation

 If Yes: Estimated Volume (Cubic Yards) 58

 Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

 Natural Attenuation

No Excavate and onsite remediation

 Other _____

 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 the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes

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 will be in accordance with ECMC 1000 Series Rules.

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. _____

Proposed date of completion of Reclamation. _____

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. 05/10/2024

Actual Spill or Release date, or date of discovery. 05/09/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/01/2024

Proposed site investigation commencement. 05/04/2024

Proposed completion of site investigation. 05/10/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/22/2024

Proposed date of completion of Remediation. 04/30/2026

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:

Ongoing excavation

OPERATOR COMMENT

Confirmation samples were collected from the excavation on November 24, 2025. Background soil samples were collected on December 19, 2025. Analytical results are pending and will be reported on a subsequent Form 27.

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

Signed: Seth Robinson

Title: Senior Env Specialist

Submit Date: 12/23/2025

Email: srobinson@civiresources.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: Alexander Ahmadian

Date: 03/11/2026

Remediation Project Number: 34816

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**

404485339	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404485559	SOIL SAMPLE LOCATION MAP
404485560	SOIL SAMPLE LOCATION MAP
404485561	ANALYTICAL RESULTS
404576435	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)