

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404118978  
Receive Date:  
02/12/2026  
Report taken by:  
Chris Sanchez

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: CITATION OIL & GAS CORP | Operator No: 17180       | Phone Numbers<br>Phone: (281) 891-1550<br>Mobile: (713) 702-7534 |
| Address: 14077 CUTTEN RD                  |                          |  |
| City: HOUSTON                             | State: TX                | Zip: 77069   |
| Contact Person: Bob Redweik               | Email: bredweik@cogc.com |  |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38817 Initial Form 27 Document #: 404085325

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: WELL                            | Facility ID: _____  | API #: 017-06379       | County Name: CHEYENNE                      |
| Facility Name: MCCORMICK 44-34 2C-X            | Latitude: 38.867837 | Longitude: -102.870475 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: SESE                                   | Sec: 34             | Twp: 13S               | Range: 49W Meridian: 6 Sensitive Area? Yes |

|  |                     |                        |  |
|--|---------------------|------------------------|--|
| Facility Type: SPILL OR RELEASE                | Facility ID: 488415 | API #: _____           | County Name: CHEYENNE                      |
| Facility Name: MCCORMICK 44-34 #2C-X           | Latitude: 38.867837 | Longitude: -102.870475 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: SESE                                   | Sec: 34             | Twp: 13S               | Range: 49W Meridian: 6 Sensitive Area? Yes |

## SITE CONDITIONS

General soil type - USCS Classifications CL

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**

According to the closest DWR water well record in proximity to the location with data available (Permit 24834 ~ 0.6 miles to the northwest), the static water elevation is 20 feet BGS. There appears to be an occupied building ~0.61 miles southeast of the site. The location is within the CPW HPH lesser prairie chicken connectivity area and estimated occupied range. The location is also ~0.77 miles from Lesser Prairie Chicken Focal Area.

# 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          | 100 square feet  | Observations, PID Screening, Confirmation 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.

During a site inspection conducted on August 19, 2024, by an ECMC representative, a spill was noted at the wellhead on location. Initial cleanup, investigation and remediation of the spill was completed October 10, 2024. A Form 19 Spill/Release (ID 488415) was initiated on October 31, 2024. On November 25, 2024, investigation sampling was completed where stained soil was previously removed around the containment. Confirmation soil samples reported exceedances of SAR and EC. Based on the exceedances, additional excavation activities of the containment were completed and additional confirmation soil samples collected. All confirmation soil samples were submitted for analysis of full Table 915-1. Confirmation soil samples were in compliance with Table 915-1 constituents.

On March 12, 2025, an investigation of soil staining to the west of the wellhead was completed. Based on the staining, an excavation was completed and confirmation soil samples collected. All confirmation soil samples were submitted for analysis of full Table 915-1. Soil samples from the March 12, 2025 excavation were in compliance with Table 915-1 constituents. All soil samples exceeding regulatory limits were excavated and removed from the 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 ):

Four (4) soil samples were collected in November 2024 as part of the Form 19 Spill Investigation below directly adjacent to the wellhead. Samples were analyzed for ECMC Table 915-1 constituents and results indicated elevated levels of TPH, EC, and SAR at the wellhead site. Two (2) additional soil samples were collected on January 14, 2025. Samples were analyzed for ECMC Table 915-1 constituents and results indicated elevated levels of EC and SAR. On March 13, 2025, eleven (11) confirmation samples were collected from the north excavation (west of the wellhead). Confirmation soil samples were in compliance with Table 915-1 constituents. Between April 10, 2025 and July 29, 2025, an additional six (6) soil samples were collected from the original excavation near the wellhead to confirm the removal of TPH, EC, and SAR. All confirmation soil samples were in compliance with Table 915-1 constituents.

### Proposed Groundwater Sampling

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

Groundwater was not encountered in either excavation area.

### 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 ):

A photoionization detector (PID) for field screening was utilized to assess soil samples throughout the excavation areas.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 28  
Number of soil samples exceeding 915-1 9  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 640

### NA / ND

-- Highest concentration of TPH (mg/kg) 1030  
-- Highest concentration of SAR 62  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 11

### Groundwater

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) \_\_\_\_\_  
Number of groundwater monitoring wells installed \_\_\_\_\_  
Number of groundwater samples exceeding 915-1 \_\_\_\_\_

\_\_\_\_ Highest concentration of Benzene (µg/l) \_\_\_\_\_  
\_\_\_\_ Highest concentration of Toluene (µg/l) \_\_\_\_\_  
\_\_\_\_ Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
\_\_\_\_ Highest concentration of Xylene (µg/l) \_\_\_\_\_  
\_\_\_\_ 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 total of six (6) background soil samples were collected near the site location and analyzed for metals in soil per ECMC Table 915-1 and Soil Suitability for Reclamation constituents. Background soil samples were collected from depths ranging between 2 and 9 feet below ground surface (ft. bgs). The maximum background concentrations for pH, SAR, EC, and boron were observed to be 8.99, 38.57, 9.18 mmhos/cm, and 5.44 mg/l, respectively. The maximum background concentration with a 1.25x multiplier applied for arsenic was calculated to be 7.64 mg/kg. All pH, boron, and arsenic concentrations observed during the site investigation were below background levels.

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.

Impacted material was excavated and transported off site to the Kit Carson Landfill in Burlington, CO. Disposal records will be kept on file and available upon request.

### 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.

Site investigations were conducted between November 25, 2024 and July 29, 2025. A total of 28 soil samples were collected from the location. Based on an exceedance of TPH, SAR, and EC, excavation was completed to the south and west of the wellhead. Confirmation sidewall and base soil samples were collected including the west excavation samples MCC44-34\_West01@5', MCC44-34\_West02@4', MCC44-34\_West03@4', MCC44-34\_West04@4', MCC44-34\_West05@5', MCC44-34\_West06@7', MCC44-34\_West07@14', MCC44-34\_West08@4', MCC44-34\_West09@7', MCC44-34\_West10@4' and the south excavation with MC44-34\_01@10', MC44-34\_03@9', MC44-34\_04@9', MC44-34\_05@9', MC44-34\_06@2', MC44-34\_07@2', MC44-34\_09@2', and MC44-34\_10@2'. All soil samples were submitted for analysis of full Table 915-1. The final excavation soil samples were in compliance with full Table 915-1.

## Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 223

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ 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.

# 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 NFA request \_\_\_\_\_

## 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.

Citation carries general liability insurance of \$2,000,000, with excess liability insurance of \$35,000,000. Citation also carries pollution/waste liability insurance of \$20,000,000, and environmental related liability insurance of \$3,000,000 for all active wells and \$1,000,000 for all plugged and abandoned wells. Citation maintains \$1,135,000 in surety bonds with the ECMC. There is no site-specific financial assurance associated with this remediation project. Citation does not intend to file an insurance claim for this remediation project.

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

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Transportation to landfill.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 223

E&P waste (solid) description E&P impacted soils

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: Kit Carson County Landfill in Burlington, CO

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 0

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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.

The facility is presently in use and reclamation activities are not currently warranted at this location.

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. 11/05/2024

Actual Spill or Release date, or date of discovery. 08/19/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/08/2024

Proposed site investigation commencement. 11/25/2024

Proposed completion of site investigation. 07/29/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/03/2025

Proposed date of completion of Remediation. 07/29/2025

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 Form 27 Supplemental is being submitted as the 1Q2026 quarterly report for the McCormick (44-34) #2C-X location.

Analytical results from the confirmation soil samples collected following excavation activities indicated that soil sample results are in compliance with Table 915-1.

Soil sample locations are provided in Attachment A, sample details are included in Attachment B, analytical results are summarized in Attachment C, photo documentation is provided in Attachment D, and analytical reports are provided in Attachments E-K.

Based on the data presented in this form, Citation is requesting an NFA determination for this location.

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

Signed: Bob Redweik

Title: VP - EHS & Regulatory

Submit Date: 02/12/2026

Email: bredweik@cogc.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: Chris Sanchez

Date: 03/12/2026

Remediation Project Number: 38817

**COA Type****Description**

|        |   |
|--------|---|
|        | Operator shall continue Quarterly Reporting until the Site Assessment is completed, and the remediation area demonstrates Compliance with Full Table 915-1 Standards.   |
|        | All ongoing/unaddressed comments/COAs from previous Forms remain applicable.  |
|        | ECMC removed the final closure request for this Form 27-S document no. 404118978.<br><br>Analytical data from background samples MCC44-342CXBG@2', MCC44-34_BG01@5', MCC44-34_BG01@6', MCC44-34_BG02@3', MCC44-34_BG02@6', and MCC44-34_BG02@9' does not appear to be representative of background conditions near the well/production facility. Operator shall provide justification for the use of MCC44-342CXBG@2', MCC44-34_BG01@5', MCC44-34_BG01@6', MCC44-34_BG02@3', MCC44-34_BG02@6', and MCC44-34_BG02@9' for their site-specific background determination. |
| 3 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**

|           |                                  |
|-----------|----------------------------------|
| 404118978 | FORM 27-SUPPLEMENTAL-SUBMITTED   |
| 404542771 | OTHER                            |
| 404542772 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404542773 | PHOTO DOCUMENTATION              |
| 404542774 | LABORATORY ANALYTICAL REPORT     |
| 404542775 | LABORATORY ANALYTICAL REPORT     |
| 404542776 | LABORATORY ANALYTICAL REPORT     |
| 404542777 | LABORATORY ANALYTICAL REPORT     |
| 404542778 | LABORATORY ANALYTICAL REPORT     |
| 404543106 | SOIL SAMPLE LOCATION MAP         |

Total Attach: 10 Files

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

|               |  |            |
|---------------|--|------------|
| Environmental | ECMC added Well API # 05-017-06379 as a related Facility | 03/12/2026 |
|---------------|--|------------|

Total: 1 comment(s)