

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404567612
Receive Date:
03/05/2026

Report taken by:
Collin Metz

Site Investigation and Remediation Workplan (Initial 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 ECOM 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>TEP ROCKY MOUNTAIN LLC</u>	Operator No: <u>96850</u>	Phone Numbers
Address: <u>1058 COUNTY ROAD 215</u>		Phone: <u>(970) 623-4875</u>
City: <u>PARACHUTE</u> State: <u>CO</u> Zip: <u>81635</u>		Mobile: <u>()</u>
Contact Person: <u>Michael Gardner</u>	Email: <u>Michael.Gardner@flywheelenergy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 44473 Initial Form 27 Document #: 404567612

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

No Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>493176</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>TR 32-28-597 Cuttings Trench</u>	Latitude: <u>39.587273</u>	Longitude: <u>-108.281472</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>28</u>	Twp: <u>5S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use Rangeland / Grazing
 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

Ephemeral drainages lie ~1,360 feet to the southwest and southeast, as well as 2,395 feet to the east. Refer to the attached Sensitive Area Determination (SAD) for a list potential receptors, as well as available on the ECMC database (Doc# 403426249)

The TR 32-28-597 pad received a waiver from the CPW with respect to the Greater Sage-grouse high priority habitat (Doc# 403426247). Refer to the Wildlife Plan for further details (Doc# 403426246).

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
No	SOILS	Cuttings Trench	Confirmation 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.

The purpose of this Form 27 is to request permanent closure of the cuttings trench located at the TR 32-28-597 well pad. This request is for the routine, planned closure of the cuttings trench. There is no historical or current spill associated with this Form 27.

Cuttings were managed onsite as outlined within the approved and attached waste management plan (WMP) - Doc# 404132590

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):

Initial cuttings sampling will consist of four (4) samples collected from the bins as cuttings are being generated, blended and segregated into their associated quadrant.

BIN1-S1 = Quad 1
BIN1-S2 = Quad 2
BIN2-S1 = Quad 3
BIN2-S2 = Quad 4

Additional sampling will consist of discrete samples being collected from the cuttings trench at various locations and depths, ranging from 0-18 feet, ensuring a complete and accurate profile characterization is conducted of the cuttings. TEP is proposing to collect a total of 15 discrete samples from the cuttings trench to be analyzed for the full ECMC Table 915-1.

Refer to the attached approved WMP (Doc# 404132590) for proposed initial sampling and reduce sampling frequency request.

Proposed Groundwater Sampling

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

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

Number of soil samples collected 19
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 23625

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 18

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 100
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

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
0 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?

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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

N/A - Cuttings will remain onsite within the trench.

As outlined within the approved WMP (Doc# 404132590). In cases where weather conditions, safety concerns, or operational constraints require, drill cuttings may be transported via truck to an approved third-party commercial disposal facility, or an approved TEP E&P Centralized Waste Management Facility (CWWMF), in accordance with COGCC rules for treatment and final disposal. Any excess drill cuttings that exceed the capacity of the cuttings trench will either be hauled to an approved third-party disposal facility, or utilized for beneficial reuse in recontouring during reclamation, if the cuttings meet Table 915-1 or are within background limits in the footnotes listed in Table 915-1.

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.

Drill cuttings will be mixed at a 1:1 ratio as outlined within the WMP (Doc# 404132590). Initial samples will be collected from the cuttings as they are being generated, blended and segregated into their associated quadrants. Discrete confirmation samples will be collected from the mixed cuttings within the trench for final confirmation. All initial sampling will consist of the full ECOM Table 915-1 analysis.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

No _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
Name of Licensed Disposal Facility or ECMC Facility ID # _____
Yes _____ Excavate and onsite remediation
_____ No _____ Land Treatment
_____ No _____ Bioremediation (or enhanced bioremediation)
_____ No _____ Chemical oxidation
_____ Yes _____ Other _____ Mixing as outlined within the WMP (Doc#
404132590)

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.

None

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

This Initial Form 27 and S-Form 27's was pending the approval of the Form 15 (approved 2/13/26)

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Supp. Form 27 closure will be submitted within 30 days of this Initial Form 27 approval.

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.

Please see TEP's current Financial Assurance Plan (see attached Form 3 Doc #403378610) that was previously approved by ECMC, and which was effective on April 26, 2023. This Financial Assurance Plan has been provided to comply with the Financial Assurance requirements outlined in the ECMC Section 700 rules and provides adequate information to fully address anticipated costs pertaining to the plugging, abandonment, and remediation of any TEP well / facility. Per ECMC's approval of this Financial Assurance Plan (Form 3), TEP's existing financial assurance levels are deemed sufficient to protect against property damage, bodily injury to personnel and contractors, or any potential releases of pollution to the environment that may threaten public health, safety, or welfare.

Operator anticipates the remaining cost for this project to be: \$ 0 _____

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:

Drill cuttings use onsite within the cuttings trench as outlined within the approved WMP (Doc# 404132590) and Form 15 (Doc# 404132307)

Volume of E&P Waste (solid) in cubic yards _____ 7911

E&P waste (solid) description Water based drill cuttings

ECMC Disposal Facility ID #, if applicable: _____ 493176

Non-ECMC Disposal Facility: _____

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

E&P waste (liquid) description None

ECMC Disposal Facility ID #, if applicable: _____ 0

Non-ECMC Disposal Facility: 0

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.

Interim reclamation of the pad will be performed per the attached construction and reclamation plans. In general, clean, stockpiled fill material is added to the drill cuttings and mixed within the cuttings trench using large excavators and dozers to thoroughly mix and blend the material. The mixed material is sampled on multiple occasions throughout the mixing process to ensure that Table 915-1 cleanup standards are achieved. Once the treated / mixed cuttings materials have successfully attained Table 915-1 cleanup standards, the mixed materials are contoured within the trench. The trench is then covered (capped) with a uniform layer of clean fill material. The cap and cut-slope areas are then contoured to match the pre-existing and adjacent slopes and topography as closely as possible. Stockpiled topsoil is then spread over the recontoured areas. The interim reclamation areas are then hydro-seeded with a seed mix approved by the surface owner (BLM). This seed mix is attached. Soil amendments will also be used as needed to optimize successful germination. Storm water BMPs are installed per TEP Best Management Practice (BMP) manual to protect the newly reclaimed site and to minimize and control sediment from leaving the location. The progress and success of revegetation efforts at this location will be closely monitored by TEP staff. This location is part of TEP's annual weed spraying and control program which is designed to prevent the establishment and spread of noxious weeds.

Is the described reclamation complete? _____

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/21/2025

Proposed site investigation commencement. 05/21/2025

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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

Please forward onto Collin Metz

This Initial Form 27 is being submitted to request a REM# for the management of drill cuttings located on the TR 32-28-598 well pad.

Cuttings will be managed onsite within an "L" shaped trench constructed on the north and east side of the location (See Form 15 -Doc# 404132307/ Pit # 493176 submitted on 03/19/2025 and approved on 02/13/2026) and in accordance with the Waste Management Plan (Doc# 404132590). Any volume that cannot be managed within the trench will be used onsite for recontouring during reclamation (upon satisfying Table 915-1 requirements) or hauled off-site and managed at a 3rd party disposal facility or at TEP Centralized Waste Management Facility approved for cuttings management (i.e. Starkey Gulch Cuttings Trench).

As outlined within the WMP, TEP proposes to collect four (4) discrete initial cuttings samples segregated into four (4) quadrants to be used for initial profiling and requesting a reduced sampling frequency in accordance with ECMC 905.g Drill Cuttings Guidance Document. All four samples will be submitted to the lab for the full ECMC Table 915-1 analysis and results from the initial sampling will be considered representative of the additional drills on location as they will all be drilled within the same geologic formation and horizons.

TEP proposes to collect 15 discrete samples from the cuttings trench at various locations and depths as outlined with the attached sample location map. Each cuttings trench sample will be collected after having been mixing at a 1:1 ratio, as well as further mixing within the trench with clean native soil stockpiled onsite from the excavation of the trench.

TEP requests and proposes a total of 15-19 discrete samples be collected and analyzed for the full ECMC Table 915-1, making each sample representative of approximately 416-527 yards of raw cuttings. Follow-up sampling will be conducted at each sample point containing an exceeding analyte to Table 915-1 after further mixing and blending occurs and will be in addition to the initial 15-19 samples.

Initial sampling will consist of discrete confirmation sample(s) being collected and submitted for the full analysis outlined within ECMC Table 915-1. The initial confirmation samples will fulfill the sampling requirements of Rule 913.b.(2) and Rule 915.e.(2).C. In the event that specific analytes within the initial sampling results exceed the thresholds outlined within Table 915-1, follow-up sampling will be conducted at the previously established same point upon further remediation/treatment has been conducted. In accordance with Rule 913.e. (2).C, TEP is requesting a reduced analyte list be approved for follow-up sampling to consist of the specific analyte(s) that exceeded in the previously collected sampling event(s). Justification for such request is demonstrated by analyzing the initial sample for the full analytes list in Table 915-1, completing an E&P waste profile.

Background samples from the undisturbed soils around the location will be collected and used for inorganic and metals comparison. Previously collected background data from the adjacent locations in the surrounding area/field will be also be used for comparison.

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

Signed: Kris Rowe

Title: TEP Environmental

Submit Date: 03/05/2026

Email: Kris.Rowe@flywheelenergy.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: Collin Metz

Date: 03/16/2026

Remediation Project Number: 44473

COA Type

Description

	<p>Operator states: "Initial sampling will consist of discrete confirmation sample(s) being collected and submitted for the full analysis outlined within ECMC Table 915-1. The initial confirmation samples will fulfill the sampling requirements of Rule 913.b.(2) and Rule 915.e.(2).C. In the event that specific analytes within the initial sampling results exceed the thresholds outlined within Table 915-1, follow-up sampling will be conducted at the previously established same point upon further remediation/treatment has been conducted. In accordance with Rule 913.e. (2).C, TEP is requesting a reduced analyte list be approved for follow-up sampling to consist of the specific analyte(s) that exceeded in the previously collected sampling event(s). Justification for such request is demonstrated by analyzing the initial sample for the full analytes list in Table 915-1, completing an E&P waste profile."</p> <p>Operator shall analyze soil samples for complete Table 915-1 Contaminants of Concern until Operator has submitted sufficient characterization data to request and receive Director Approval of reduced list of contaminants of concern.</p>
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1 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
404567612	FORM 27-INITIAL-SUBMITTED

404567847	REMEDIAL ACTION PLAN
404567916	OTHER
404567923	RECLAMATION PLAN
404567940	SOIL SAMPLE LOCATION MAP
404568263	OTHER

Total Attach: 6 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)