

State of Colorado
Energy & Carbon Management Commission

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Receive Date:

Report taken by:

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 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: CITATION OIL & GAS CORP	Operator No: 17180	Phone Numbers Phone: (281) 891-1550 Mobile: (731) 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 #: 38695 Initial Form 27 Document #: 404065748

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 #: 017-06275	County Name: CHEYENNE
Facility Name: MCCORMICK 24-3 6	Latitude: 38.852615	Longitude: -102.880506	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESW	Sec: 3	Twp: 14S	Range: 49W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 488390	API #: _____	County Name: CHEYENNE
Facility Name: MCCORMICK 24-3 #6	Latitude: 38.852615	Longitude: -102.880506	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESW	Sec: 3	Twp: 14S	Range: 49W Meridian: 6 Sensitive Area? Yes

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>489205</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>McCormick 24-3 #6</u>	Latitude: <u>38.852615</u>	Longitude: <u>-102.880506</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>3</u>	Twp: <u>14S</u>	Range: <u>49W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>489976</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>McCormick 24-3 #6 Flowline</u>	Latitude: <u>38.852615</u>	Longitude: <u>-102.880506</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>3</u>	Twp: <u>14S</u>	Range: <u>49W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

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? Yes

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

The closest water well is a stock well located approximately 830 feet North of the site and has a depth to static water measurement of 18 feet. There are no occupied buildings within 1 mile of the site. The location is within the CPW HPH lesser prairie chicken connectivity area and estimated occupied range.

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
UNDETERMINED	GROUNDWATER	Refer to Tables and Figures	Laboratory analysis and field screening
Yes	SOILS	~5,000 square feet	Laboratory analysis and field screening

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 location. Initial cleanup, investigation, and excavation of the soil staining was completed October 10, 2024. A Form 19 Spill/Release (ID 488390) was initiated on October 25, 2024. On November 26, 2025, investigation sampling was completed where stained soil was previously removed around the wellhead and compressor shed. Further investigation sampling of the wellhead was completed on January 14, 2025. On January 28, 2025, an equipment malfunction occurred that resulted in oil being released in a spray from the pumping unit under extremely windy conditions. A Form 19 Spill/Release (ID 489205) was submitted on January 30, 2025. On January 29, 2025, soil samples were collected within the sprayed area, on the pad surface, and offsite in the native vegetation. All soil samples were submitted for analysis of full Table 915-1. Soil samples were in compliance with Table 915-1 constituents with the exception of inorganic exceedances in MCC24-3_SS01@3', MCC24-3_SS01@4', MCC24-3#6_SS01@5', MC24-3_SD05@6" and TPH exceedance in soil sample MC24-3_SD01@6". All of the samples exceeding regulatory limits were located onsite directly adjacent to the pumping unit. Based on TPH exceedances at soil sample locations MCC24-3#6WH@2' and MC24-3_SD01@6", further investigation and excavation was initiated January 30, 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):

All soil samples were submitted for analysis of Full Table 915-1 until the location was adequately characterized and no organics exceedances were observed. Soil samples were submitted for consistently failing inorganic parameters being analyzed for pH, SAR, and EC. Delineation continued until a sample passed for inorganics parameters and a final confirmation sample was then collected and submitted for full Table 915-1. Organics have been excavated and disposed of offsite. All confirmation soil samples were in compliance with Table 915-1 organic constituent standards. Confirmation soil samples were in compliance with Table 915-1 inorganic constituent standards and/or site-specific background levels, with the exception of the following sample locations: MC24-3_04, MC24-3_04-1, MC24-3_04-2, MC24-3_08, MC24-3_08-1, MC24-3_13, MC24-3_16, MC24-3_17, and MC24-3_17-1. Remaining delineation of inorganics is ongoing, further investigation and remediation will be reported in subsequent reports.

Proposed Groundwater Sampling

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

Between April 23, 2025 and July 2, 2025, groundwater was observed in the excavation at between approximately 20 and 23 feet below ground surface (bgs). Two (2) groundwater samples (MC_24-3_GW01 and MC_24-3_GW02) were collected and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-TMB, by US EPA Method 8260, as well as TDS, chloride, and sulfate (inorganics). Analytical results indicated groundwater samples were in compliance with ECMC Table 915-1 standards and/or site-specific background standards (x 1.25 for inorganics), with the exception of inorganics in groundwater sample GW01.

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 has been utilized to assess soil samples throughout excavation activities and will continue to be used until remediation of the location. Additional excavation and site investigation activities are ongoing and shall be conducted to confirm removal of impacted material.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 106

Number of soil samples exceeding 915-1 62

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 400

NA / ND

-- Highest concentration of TPH (mg/kg) 1262

-- Highest concentration of SAR 39.58

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 17

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 20

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 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) _____

NA 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?

Seven (7) background soil samples were collected between November 26, 2024 and January 31, 2025 off-location to the north at approximately 2, 6, 9, 12, and 15 feet below ground surface (bgs). An additional ten (10) background soil samples were collected on January 7, 2026 off-location to the west at approximately 2, 5, 10, 15, and 20 feet bgs. All background soil samples were analyzed for Table 915-1 metals and soil suitability constituents. Analytical results indicated samples exhibited elevated levels of pH, SAR, EC, arsenic, and barium. In addition, one (1) background groundwater was collected from a nearby off-location ~18' deep stock well (Attachment A). The background groundwater sample was submitted for full Table 915-1 constituents. Background sample results are provided in Attachment C.

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?

Additional site investigation activities shall be conducted to delineate the extent of inorganic impacts to soil and groundwater. Inorganic impacted soils will be removed within the rootzone, and groundwater will be remediated insitu.

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.

Approximately 3,380 cubic yards of impacted material were excavated from the spill area and transported off site to the Kit Carson County Landfill in Burlington, CO. Soil disposal records are provided in Attachment F.

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.

The extent of the impacted area will continue to be delineated using a hand auger and photoionization detector (PID), before and during excavation. Soil samples will continue to be collected as needed to characterize and/or demonstrate confirmation of impacts. All confirmation soil samples will be analyzed for all ECMC Table 915-1 parameters to determine regulatory compliance unless a reduced analyte list is approved by the ECMC. Further investigations for delineating the vertical extent of inorganic impacts using a drill rig was completed on 3/4/2026. Investigation results will be summarized in a forthcoming Form 27 Supplemental Report.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 3380

_____ 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.

Five (5) groundwater monitoring wells were installed March 2, 2026 to delineate and characterize inorganic groundwater impacts at this location. Monitoring well locations include one (1) within the former excavation and four (4) around the excavation in each approximate cardinal direction from the wellhead. A background monitoring well was installed north of the pad in the adjacent undisturbed native surface and subsurface. Installed monitoring well locations are provided in Attachment A.

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 Project status update

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 3380

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? No

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

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? _____

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). 10/07/2024

Proposed site investigation commencement. 11/25/2024

Proposed completion of site investigation. 04/30/2027

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/07/2024

Proposed date of completion of Remediation. 04/30/2027

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:

The initial estimated schedule was proposed in early 2025 before groundwater was encountered and prior to understanding the extent of impacts. The new implementation schedule considers the results from the 2025 investigations and groundwater monitoring investigations to be completed in 2026. The schedule for investigation/remediation activities is highly weather and site condition dependent. Timing of progress may need to be adjusted accordingly to facilitate successful and safe work conditions.

OPERATOR COMMENT

See Attachment G.

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

Signed: Bob RedweikTitle: VP EHS and Regulatory

Submit Date: _____

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: _____

Date: _____

Remediation Project Number: 38695**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**

404565950	ANALYTICAL DATA SUMMARY TABLE(S)
404585099	OTHER
404585101	LABORATORY ANALYTICAL REPORT
404585102	PHOTO DOCUMENTATION
404585103	DISPOSAL MANIFESTS
404585855	OTHER
404585857	SITE MAP

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)