

State of Colorado
Energy & Carbon Management Commission

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404332509
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Report taken by:
John Heil

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>QB ENERGY OPERATING LLC</u>	Operator No: <u>10844</u>	Phone Numbers
Address: <u>1001 17TH STREET SUITE 1600</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Andy Verbonitz</u>	Email: <u>averbonitz@qb-energy.com</u>	Phone: <u>(970) 902-3598</u>
		Mobile: <u>(970) 902-3598</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34380 Initial Form 27 Document #: 403709318

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: Q3 2025 Status Update to Remediation Project Number (RPN) 34380

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>GAS COMPRESSOR STATION</u>	Facility ID: <u>419752</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>BULL FORK COMPRESSOR STATION</u>	Latitude: <u>39.695594</u>	Longitude: <u>-108.283333</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>4S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485683</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>Bullfork Tank Bullplug Freeze</u>	Latitude: <u>39.696385</u>	Longitude: <u>-108.282971</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>4S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use East Willow Creek, located approximately 200' west of location

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

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 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
Yes	GROUNDWATER	TBD	Laboratory Analytical
Yes	SOILS	TBD	Laboratory Analytical
No	SURFACE WATER	NA	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.

Please reference the ECMC Form 19 for Spill/Release Point ID Number 48563 Document Number (DN) 403620883 for emergency response measures taken. Reference Remediation Number 34380 for initial liner integrity inspection and initial characterization details provided via initial Form 27 DN 403709318.

Between June 9 and 13, 2025 a total of six monitoring wells and two soil borings were installed at the Site at depths ranging from 42 to 59 ft below ground surface (bgs) to further delineate (laterally and vertically) previously documented ECMC Table 915-1 soil and groundwater exceedances in the subsurface. A total of twenty-three confirmation soil samples and six groundwater samples were collected and submitted for full Table 915-1 laboratory analysis. Please see Form 27 Document Number (DN) 404256925 for a summary of these activities. At the time of second quarter (Q2) 2025 quarterly Form 27 submittal, the corresponding laboratory groundwater and soil boring analytical data were not available for reporting and inclusion in DN 404256925. Please see the attached report of work completed (ROWC) for an in-depth summary of the laboratory analytical results of the confirmation soil and groundwater samples obtained during Q2 2025.

Additionally on September 8, 2025 quarterly (Q3) groundwater sampling was performed at all six monitoring wells at the Site. Please attached ROWC for summary of quarterly sampling activities.

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):

Lateral delineation of organic exceedances of ECMC Table 915-1 analytes have generally been confirmed in the northern, western, and southern cardinal directions. Lateral delineation of organic constituents is incomplete in the east/northeastern portion of the Site. Lateral delineation of inorganic exceedances has not been defined at the Site. Vertical delineation of organics is complete; however, vertical delineation of the inorganics is incomplete.

Additional drilling assessment will be conducted to delineate soil impacts at the location. Additionally, please see attached ROWC detailing the analytical results from the most recent site investigation. Please see "Operator Comments" for a QB's request for a reduced analytic suite.

Proposed Groundwater Sampling

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

Based on laboratory analytical data from the Q2 of 2025 groundwater sampling event, additional monitoring wells along the eastern portion of the pad will be installed to serve as precautionary cross gradient points of compliance. QB will continue with quarterly groundwater monitoring and sampling activities at the site going forward. Samples will continue to be analyzed for the full ECMC Table 915-1 Cleanup Concentrations of groundwater analytes. Please see attached ROWC detailing the analytical results from the most recent site investigation. QB is currently waiting for groundwater analytical results to be returned from the laboratory for Q3 sampling.

Proposed Surface Water Sampling

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

Surface water samples will be collected during the next spring runoff event if flow is present as a precautionary measure.

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Please see "Proposed Soil Sampling" section and attached ROWC.

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? No

Approximate areal extent (square feet) 21215

NA / ND

-- Highest concentration of TPH (mg/kg) 3153.31

-- Highest concentration of SAR 9.61

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 59

Groundwater

Number of groundwater samples collected 6

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 37

Number of groundwater monitoring wells installed 6

Number of groundwater samples exceeding 915-1 3

-- Highest concentration of Benzene (µg/l) 8843.4

-- Highest concentration of Toluene (µg/l) 28512.55

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA 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?

Please see ECMC DN 403864739 for information regarding the previously collected site-specific background samples.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 0

Volume of liquid waste (barrels) 6

Is further site investigation required?

The wells will be sampled on a quarterly basis going forward.

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 6 bbls of release liquid was vacuumed up from the containment prior to it freezing.

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 impacts have confirmed to be delineated, a remediation plan will be determined.

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

 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.

Six monitoring wells were installed between June 9 through 12, 2025 at locations upgradient, cross-gradient, and downgradient, as well as in the center of the previously documented ECMC Table 915-1 soil and groundwater exceedances. Additional wells will be installed to further delineate impacts at the Site, pending future laboratory analytical results.

Please see the attached ROWC for additional information.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other Q3 2025 update of RPN 34380

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 _____

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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, QB Energy has general liability insurance in the amount of \$5M, and QB Energy has umbrella insurance, which sits over the general liability insurance in the amount of \$65M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$70M.

Operator anticipates the remaining cost for this project to be: \$ 100000

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:

None

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels 6

E&P waste (liquid) description Hydro-vac rinseate mixed with impacted water

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Greenleaf Environmental

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? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

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.

If intrusive assessment or remediation is required, any disturbed areas will be reclaimed in accordance with 1000 series rules if offsite, or returned to active pad working surface if onsite.

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. 12/10/2023

Actual Spill or Release date, or date of discovery. 12/10/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/10/2023

Proposed site investigation commencement. 05/29/2024

Proposed completion of site investigation. 12/31/2025

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

Previous background hand auger samples collected from the Site in 2024 indicate background levels of lead up to (15 mg/kg) (Figure 6). This is higher than the highest observed level of lead in all confirmation samples 20250610-Bull Fork CS-(MW-04)@40-42 of 14.08 mg/kg. This indicates that lead is elevated naturally at the Site and within background soil concentrations. QB is requests the ECMC Director relief lead as a contaminant of concern in accordance with ECMC Table 915-1 Footnote 1.

Based on analytical results, QB is requesting the ECMC Director for a reduced suite for confirmation soil sampling of barium, cadmium, chromium (VI), selenium, benzene, toluene, ethylbenzene, total xylenes (BTEX), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, benz(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, naphthalene, SAR, pH, arsenic, TPH, total xylenes, and dibenz(a,h)anthracene for future confirmation soil samples. Analytical results will continue to be evaluated and reported under the ECMC Table 915-1 PGSSLCs and RSSLCs.

QB requests the Director to re-evaluate the second COA on Form 27 DN 404256925 as the lab report attached to that form is appropriately certified in accordance with ECMC requirements.

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

Signed: Andy Verbonitz

Title: EH&S Specialist

Submit Date: 09/30/2025

Email: averbonitz@qb-energy.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: John Heil

Date: 03/25/2026

Remediation Project Number: 34380

COA Type**Description**

	ECMC approves the request for a reduced suite for confirmation soil sampling of barium, cadmium, chromium (VI), selenium, benzene, toluene, ethylbenzene, total xylenes (BTEX), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, benz(a)anthracene, 1methylnaphthalene, 2-methylnaphthalene, naphthalene, SAR, pH, arsenic, TPH, total xylenes, and dibenz(a,h)anthracene.
	ECMC approves the request for relief of lead as a contaminant of concern.
2 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**

404332509	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404332522	LABORATORY ANALYTICAL REPORT
404332527	LABORATORY ANALYTICAL REPORT
404332528	LABORATORY ANALYTICAL REPORT
404332536	LABORATORY ANALYTICAL REPORT
404332551	LABORATORY ANALYTICAL REPORT
404364312	LABORATORY ANALYTICAL REPORT
404373109	SITE INVESTIGATION REPORT
404595764	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

Environmental	See LABORATORY ANALYTICAL REPORT doc 404364312 for lead background analytical results.	03/23/2026
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Total: 1 comment(s)