

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
404595551

Receive Date:

Report taken by:

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>QB ENERGY OPERATING LLC</u> | Operator No: <u>10844</u> | Phone Numbers Phone: <u>(720) 830-7549</u> Mobile: <u>(720) 830-7549</u> |
| Address: <u>1001 17TH STREET SUITE 1600</u> | | |
| City: <u>DENVER</u> | State: <u>CO</u> | Zip: <u>80202</u> |
| Contact Person: <u>Derek Horn</u> | Email: <u>dhorn@qb-energy.com</u> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: _____ Initial Form 27 Document #: 404595551

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>SPILL OR RELEASE</u> | Facility ID: <u>493197</u> | API #: _____ | County Name: <u>GARFIELD</u> |
| Facility Name: <u>B11BW Dumpline Failure</u> | Latitude: <u>39.465160</u> | Longitude: <u>-107.738150</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>NWNE</u> | Sec: <u>11</u> | Twps: <u>7S</u> | Range: <u>93W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes 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

Dry Creek 489 feet East, Occupied Building 867 feet W, Riverine 289 feet E, Aquatic Sportfish Management Waters (HPH), Elk Severe Winter Range (HPH), Mule Deer Winter Concentration Area (HPH)

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 | W 37' X L 37' X D 10' | Sampling and Laboratory Analysis |

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 refer to document numbers 404538780 (Form 19 Initial) and 404548481 (Supplemental Form 19) for initial actions taken in support of this project. Between February 12, 2026 and February 16, 2026, initial soil sampling activities were conducted at the Site. One (1) soil sample was collected at the POR from a depth of approximately 5 feet bgs. Thirteen (13) soil samples were also collected at a boring 6 feet west and 23 feet east of the POR. Samples were collected every 5 feet bgs to maximum depth of 35 feet bgs. From February 26, 2026 through February 27, 2026, three (3) soil borings were completed to the west, east, and south of the POR to a depth of 35 feet bgs. Seven (7) samples were collected from each boring at depths ranging from 5 feet to 35 feet bgs. All samples were submitted to Elevation for analysis of the full table 915-1 analytical suite with a standard turnaround request time.

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):

Based on all assessment data, it is proposed that impacted soil be excavated from the release area to an approximate depth of 10 feet bgs. It is recommended to excavate horizontally in all four (4) cardinal directions until sidewall samples are below ECMC standards.

Proposed Groundwater Sampling

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

[Empty text box for groundwater sampling details]

Proposed Surface Water Sampling

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

[Empty text box for surface water sampling details]

Additional Investigative Actions

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

A source water sample was collected from an onsite storage tank for comparison to Table 615, 915-1 metals, the full Table 915-1, and pH at the Site. Additionally, one groundwater sample was collected from the landowner's water well (MCWP-(Martindale Res)) for analysis of Table 615, 915-1 metals, the full Table 915-1, and pH.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 37

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 724

NA / ND

-- Highest concentration of TPH (mg/kg) 817.3
1

-- Highest concentration of SAR 22.35

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 35

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 80

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

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?

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?

Based on all assessment data, it is proposed that impacted soil be excavated from the release area to an approximate depth of 10 feet bgs. It is recommended to excavate horizontally in all four (4) cardinal directions until sidewall samples are below ECMC standards.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The line was isolated and shut in.

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.

Following additional soil assessment activities, a remedial approach will be proposed in a forthcoming Form 27. Remedial approach may include in-situ or ex-situ approach based on assessment results.

Soil Remediation Summary

In Situ

Ex Situ

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

_____ 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 _____ Onsite Staging and Assessment _____

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 Q1 2026 REM 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.

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: \$ _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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

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

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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.

Once remediation is complete, QB Energy proposes to return the excavation to the active working surface grade for continued operation.

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. 02/09/2026

Actual Spill or Release date, or date of discovery. 02/09/2026

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/12/2026

Proposed site investigation commencement. 02/12/2026

Proposed completion of site investigation. 02/27/2026

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

QB Energy believes a pathway to groundwater does not exist based on the following reasons and requests use of Table 915-1 Residential Soil Screening Level cleanup concentrations for future soil sample comparison:

- 1) According to data from the Division of Water Resources (DWR), Receipt Number 10021188, is located approximately 912 feet north of the Site and 24 feet lower in elevation than the POR. The well was drilled to a depth of approximately 218 feet bgs and has a recorded depth to groundwater of 60 feet bgs. Based on the elevation difference and the static groundwater level, groundwater is estimated to be approximately 80 feet bgs.
- 2) Source identified and repaired.
- 3) The closest surface water is a riverine, located approximately 289 feet E of the release and four feet lower in elevation.

Based on lab results from the initial investigation, and in consideration of the request to utilize Table 915-1 Residential Soil Screening Level standards, QB Energy requests a reduced soil sample analysis suite for the project to include TPH-GRO, TPH-DRO, TPH-ORO, ethylbenzene, total xylenes, 1,2,4-TMBs, 1,3,5 TMBs, EC, and SAR only.

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

Signed: Derek Horn

Title: EHS Specialist

Submit Date: _____

Email: dhorn@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: _____

Date: _____

Remediation Project Number: _____

COA Type**Description**

| 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**

| | |
|-----------|---------------------------|
| 404598246 | ANALYTICAL RESULTS |
| 404598247 | ANALYTICAL RESULTS |
| 404598250 | ANALYTICAL RESULTS |
| 404598251 | ANALYTICAL RESULTS |
| 404598252 | ANALYTICAL RESULTS |
| 404598254 | ANALYTICAL RESULTS |
| 404598256 | ANALYTICAL RESULTS |
| 404599101 | SITE INVESTIGATION REPORT |

Total Attach: 8 Files

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

| User Group | Comment | Comment Date |
|------------|---------|---------------------|
| | | Stamp Upon Approval |

Total: 0 comment(s)