

State of Colorado
Energy & Carbon Management Commission

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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>Blair Rollins</u> | Email: <u>brollins@qb-energy.com</u> | Phone: <u>(970) 640-6919</u> |
| | | Mobile: <u>(970) 640-6919</u> |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36196 Initial Form 27 Document #: 403804499

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: <u>PRODUCED WATER TRANSFER SYSTEM</u> | Facility ID: <u>477113</u> | API #: _____ | County Name: <u>GARFIELD</u> |
| Facility Name: <u>Mamm Creek Water System</u> | Latitude: <u>39.470419</u> | Longitude: <u>-107.715849</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>SESE</u> | Sec: <u>1</u> | Twp: <u>7S</u> | Range: <u>93W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

| | | | |
|--|----------------------------|-------------------------------|--|
| Facility Type: <u>TANK BATTERY</u> | Facility ID: <u>486170</u> | API #: _____ | County Name: <u>GARFIELD</u> |
| Facility Name: <u>Railsback Water Facility</u> | Latitude: <u>39.487561</u> | Longitude: <u>-107.690850</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>NENW</u> | Sec: <u>32</u> | Twp: <u>6S</u> | Range: <u>92W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

Facility Type: SPILL OR RELEASE Facility ID: 486172 API #: _____ County Name: GARFIELD
Facility Name: Railsback Water Facility Release Latitude: 39.487655 Longitude: -107.690884
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 32 Twp: 6S Range: 92W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION Facility ID: 486640 API #: _____ County Name: GARFIELD
Facility Name: Railsback Water Facility Latitude: 39.487561 Longitude: -107.690850
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 32 Twp: 6S Range: 92W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION Facility ID: 486641 API #: _____ County Name: GARFIELD
Facility Name: Railsback Water Facility Latitude: 39.487561 Longitude: -107.690850
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 32 Twp: 6S Range: 92W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION Facility ID: 486642 API #: _____ County Name: GARFIELD
Facility Name: Railsback Water Facility Latitude: 39.487561 Longitude: -107.690850
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 32 Twp: 6S Range: 92W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Non Crop land

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

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 | SOILS | 1000'x5'x5' Approximately | Visual inspection, field screening, analytical results |

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Caerus operations control center received a low-liquid level alarm on March 1st from the tank battery at the Railsback produced water offload facility. Upon inspection it was determined that a release of produced water and parafin occurred around the tank battery area of the facility. Emergency response procedures were implemented and proper notifications were completed. The release surfaced at and around the tank battery and flowed along the perimeter ditch and north along the ditch on the west side of CR 315. Recovery efforts were completed on March 1st to control and recover standing liquid using hydrovac truck equipment. Additional hydrovac cleaning activities were completed on March 2nd to ensure standing liquid or impacted soil was not inadvertently overlooked during the cleanup activity.

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):

Soil samples were collected from the point of release (POR) near the tank battery, both from surface and from advancement of one characterization soil boring. Soil samples also collected from the spill path as it traveled north paralleling CR 315. Details of site investigation including all field screening and analytical results are included in the attached report of work completed.

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):

Out of an abundance of caution during initial spill response activities, surface water samples were collected from Mamm Creek (up and down gradient) and from two surface water / stormwater collection ponds. Sample results are included in the attached report of work completed.

Additional Investigative Actions

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

Additional impacted soil removal at the POR and along the spill path to take place in 2024.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

| Soil | NA / ND |
|---|--|
| Number of soil samples collected <u> 7 </u> | -- Highest concentration of TPH (mg/kg) <u> 229 </u> |
| Number of soil samples exceeding 915-1 <u> 7 </u> | -- Highest concentration of SAR <u> 41.15 </u> |

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

BTEX > 915-1 No

Approximate areal extent (square feet) 5000

Vertical Extent > 915-1 (in feet) 20

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

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

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

Background soil samples were collected in support of this project and were reported in Form 27 Q2 2025 Doc # 404212346.

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

Volume of solid waste (cubic yards) 900

Volume of liquid waste (barrels) 0

Is further site investigation required?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Based on previously determined vertical and horizontal extent of impacts associated with the project, QB Energy completed mechanical excavation of the impacts associated with the project. The impacts were placed on the surface of the location to allow for adequate assessment sampling of the stockpile. The extent of vertical and horizontal contamination was determined through excavation and sampling for the reduced analyte suite (ECMC Doc # 403804499). All excavation and stockpile samples are in compliance with ECMC Table 915-1 standards and approved allowable alternative concentrations - Table 915-1 Footnote 1 (ECMC Doc # 404212346).

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.

Based on excavation and stockpile sample results within compliance for ECMC Table 915-1 standards and approved allowable alternative concentrations (Table 915-1 Footnote 1), remediation is complete and QB Energy requests closure of the project and to utilize the stockpile for backfill of the excavation.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ No 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

_____ Yes Excavate and onsite remediation

Other _____

No Land Treatment

No Bioremediation (or enhanced bioremediation)

No Chemical oxidation

Yes Other Staging and Table 915-1 sampling _____

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.

In the event that groundwater is encountered during release investigation, the CECMC will be notified and a representative sample will be collected for laboratory analysis.

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 2026 Q1 Progress Report and NFA Closure 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.

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: \$ 50000

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: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

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.

Once NFA is granted for the site, QB Energy will begin final reclamation of the location following ECMC 1000 series regulations.

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? Yes

If YES, does the seed mix comply with local soil conservation district recommendations? Yes

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 04/15/2026

Proposed date of completion of Reclamation. 06/01/2026

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. 03/01/2024

Actual Spill or Release date, or date of discovery. 03/01/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/01/2024

Proposed site investigation commencement. 03/01/2024

Proposed completion of site investigation. 08/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/01/2024

Proposed date of completion of Remediation. 11/01/2025

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

QB Energy completed mechanical excavation and staging of impacted material on the surface of the location with Q1 2026. Confirmation samples were collected from the sidewalls of the excavation and the staged stockpile material to demonstrate compliance with the reduced analyte suite and alternative allowable concentrations approved for the project. Confirmation of compliance within the base of the excavation was completed through field screening and visual investigation within the excavation at the previously provided compliance depths collected in soil borings and reported to the ECMC within the first, second, and third quarters of 2024.

Field observations and analytical results indicate that all soil impacted by the release at the Railsback water transfer facility have been removed. One exceedance for EC remains above the currently approved background level of 16.8 mmhos/cm in sample 20260303-RAILSBACK WTF-(POR-WW01)@10 at 19.72 mmhos/cm. Considering all other analytical results and the range of EC values in previously reported background soil samples (Table 2), an EC of 19.72 mmhos/cm is likely representative of naturally occurring soil composition within the area.

Based on the information provided, QB Energy requests the Director's approval to adjust the threshold for EC to 19.72 mmhos/cm. Pending approval of this adjustment, QB Energy requests closure and no further action for the project.

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

Signed: Blair Rollins

Title: EHS Specialist

Submit Date: 03/27/2026

Email: brollins@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: 04/08/2026

Remediation Project Number: 36196

COA Type**Description**

| | |
|-------|---|
| | Based on a review of the information provided, it appears that no further action is necessary at this time and ECMC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site. |
| 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**

| | |
|-----------|--|
| 404597621 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 404597627 | LABORATORY ANALYTICAL REPORT |
| 404597638 | LABORATORY ANALYTICAL REPORT |
| 404598555 | SITE INVESTIGATION REPORT |
| 404611726 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 5 Files

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

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)