

**State of Colorado**  
**Energy & Carbon Management Commission**

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Document Number:  
404596434  
Receive Date:  
04/01/2026

Report taken by:  
Chris Sanchez

**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 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>GRAND MESA OPERATING CO</u>        | Operator No: <u>35080</u>            | <b>Phone Numbers</b>          |
| Address: <u>1700 N WATERFRONT PKWY B600</u>             |                                      | Phone: <u>(303) 265.3000</u>  |
| City: <u>WICHITA</u> State: <u>KS</u> Zip: <u>67206</u> |                                      | Mobile: <u>(316) 258.8948</u> |
| Contact Person: <u>Jay Schweikert</u>                   | Email: <u>jschweikert@gmocks.com</u> |                               |

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 44995 Initial Form 27 Document #: 404596434

**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>LOCATION</u>                 | Facility ID: <u>464908</u> | API #: _____                  | County Name: <u>LINCOLN</u>                                     |
| Facility Name: <u>YELLOWSTONE 1-2</u>          | Latitude: <u>39.384240</u> | Longitude: <u>-103.510440</u> |   |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |   |
| QtrQtr: <u>SWNE</u>                            | Sec: <u>2</u>              | Twp: <u>8S</u>                | Range: <u>55W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

|  |                            |                               |   |
|--|----------------------------|-------------------------------|---|
| Facility Type: <u>SPILL OR RELEASE</u>         | Facility ID: <u>491192</u> | API #: _____                  | County Name: <u>LINCOLN</u>                                     |
| Facility Name: <u>Yellowstone 1-2 Spill</u>    | Latitude: <u>39.383400</u> | Longitude: <u>-103.514650</u> |   |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |   |
| QtrQtr: <u>SWNE</u>                            | Sec: <u>2</u>              | Twp: <u>8S</u>                | Range: <u>55W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

**SITE CONDITIONS**

General soil type - USCS Classifications OL

Most Sensitive Adjacent Land Use freshwater  
emergent  
wetland

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**

Freshwater emergent wetland to southeast

# 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 type="checkbox"/> Produced Water       | <input type="checkbox"/> Workover Fluids             | _____                                  |
| <input checked="" type="checkbox"/> Oil       | <input type="checkbox"/> Tank Bottoms                |  |
| <input 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          | 18'x20'x10'depth | soil 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.

A December 2024 inspection identified staining at the wellhead. Grand Mesa conducted excavation through July 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 ):

Additional work will be completed at the site, including

- Advance eight (8) additional boreholes for collection of background samples various depths. Background samples will be analyzed for Table 915-1 metals, pH, EC, SAR, and boron.
- Advance one borehole directly adjacent to the excavation to the southeast, in the direction of a mapped freshwater emergent wetland for vertical delineation.

### Proposed Groundwater Sampling

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

Groundwater samples will be collected if encountered.

### 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   | NA / ND   |
|--|---|
| Number of soil samples collected <u>48</u>                                     | -- Highest concentration of TPH (mg/kg) <u>2510</u> |
| Number of soil samples exceeding 915-1 <u>48</u>                               | -- Highest concentration of SAR <u>5.14</u>         |
| Was the areal and vertical extent of soil contamination delineated? <u>Yes</u> | BTEX > 915-1 <u>No</u>                              |

Approximate areal extent (square feet) 360

Vertical Extent > 915-1 (in feet) 10

**Groundwater**

Number of groundwater samples collected 0

NA Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? Yes

NA Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) 50

NA Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed 0

NA Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 0

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?

25 background soil samples have been collected from various depths at the site to further understand background conditions in relation to soil suitability parameters and arsenic concentrations in soil.

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

Volume of solid waste (cubic yards) 125

Volume of liquid waste (barrels) 0

Is further site investigation required?

\_\_\_\_\_

**REMEDIAL ACTION PLAN**

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

Soil excavation and offsite disposal has been completed for all impacted soil.

**REMEDATION 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.

Soil excavation and offsite disposal has been completed for all impacted soil.

**Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 125

\_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

No Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

**Groundwater Remediation Summary**

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

No \_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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.

N/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 soil excavation and ongoing sampling

## 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.

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:

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 125

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: Waste Management Midway Landfill, Fountain CO

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

E&P waste (liquid) description N/A

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: N/A

# 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.

Site will be reclaimed in accordance with ECMC Rules.

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. 08/28/2025

Actual Spill or Release date, or date of discovery. 08/11/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/05/2025

Proposed site investigation commencement. 02/05/2025

Proposed completion of site investigation. 02/12/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/05/2025

Proposed date of completion of Remediation. 02/12/2026

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**

This Form 27 is being submitted requesting closure for Release 491192.

In relation to former COAs:

- \* All analytical data is included in table form in the attached report.
- \* All analytical reports are attached as secure pdfs.
- \* LGD and Surface owner notifications are included in attached report.
- \* Waste manifests are included in the attached report.
- \* Photo documentation is included in the attached report.
- \* Justification for use of Residential SSL is provided in the attached report; there is no pathway to groundwater at the site.
- \* All soil samples being used for closure request were submitted to the laboratory within the recommended temperature range.
- \* GPS Data for soil samples used for closure request was collected in accordance with requirements of Rule 216 using a Trimble GPS Geo7X 7000
- \* This Form 27 was not submitted within the required timeframe because active excavation and site assessment activities were ongoing at the spill location. At the time, it was anticipated that these efforts would bring the site to a condition suitable for requesting closure within the requested time period. To prevent late reporting in the future, we have implemented the following measures:
  1. Established internal tracking of regulatory deadlines independent of project milestones
  2. Increased coordination between field teams and regulatory compliance staff to ensure timely identification of reporting requirements
  - 3 Implemented periodic compliance check-ins during active remediation to confirm submittal timelines are being met

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

Signed: Rachel Peterson

Title: Env. Dept. Manager

Submit Date: 04/01/2026

Email: petersonr@agwco.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: Chris Sanchez

Date: 05/01/2026

Remediation Project Number: 44995

**COA Type****Description**

|        |   |
|--------|---|
|        | Upon approval of this Form 27-I the Operator shall submit a Supplemental Form 19 Requesting Closure of Spill Facility ID 491192   |
|        | Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil   |
|        | ECMC approves Operator's request for use of Residential SSLs based on the depth to groundwater and the local lithology suggesting a pathway to groundwater at this location is not likely. However, if groundwater is encountered or a pathway to groundwater is identified the Operator shall adhere to Protection of Groundwater Soil Screening Levels.   |
|        | Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.  |
|        | Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. Quarterly updates shall include a current map of the subject location including current excavation limits and/or sample locations, proposed/actual soil boring locations and monitoring well locations. GPS data used to create the map must comply with ECMC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit field notes of all field activities reported during a Quarterly Update along with photo documentation. |
|        | In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days).  |
|        | Ongoing/unaddressed comments/COAs from previous Forms remain applicable   |
|        | Operator shall continue Quarterly Reporting until the Site Assessment is completed, and the remediation area demonstrates Compliance with Full Table 915-1 Standards.   |
| 8 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**

|           |   |
|-----------|---|
| 404596434 | INVESTIGATION/REMEDATION WORKPLAN (INITIAL) |
|-----------|---|

|           |                           |
|-----------|---------------------------|
| 404603866 | SITE INVESTIGATION REPORT |
| 404603983 | ANALYTICAL RESULTS        |
| 404603984 | ANALYTICAL RESULTS        |
| 404603985 | ANALYTICAL RESULTS        |
| 404603987 | ANALYTICAL RESULTS        |
| 404603990 | ANALYTICAL RESULTS        |
| 404603993 | ANALYTICAL RESULTS        |
| 404603994 | ANALYTICAL RESULTS        |
| 404643411 | FORM 27-INITIAL-SUBMITTED |

Total Attach: 10 Files

### General Comments

| <u>User Group</u> | <u>Comment</u>   | <u>Comment Date</u> |
|-------------------|--|---------------------|
| Environmental     | ECMC added Spill Facility ID: 491192 as a related facility | 05/01/2026          |

Total: 1 comment(s)