

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:
404598756
Receive Date:
03/27/2026
Report taken by:
RICK ALLISON

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: PRAIRIE OPERATING CO LLC	Operator No: 10819	Phone Numbers Phone: (303) 229-1228 Mobile: ()
Address: 44 COOK STREET, SUITE 1000		
City: DENVER	State: CO	Zip: 80206
Contact Person: Brad Rogers	Email: brad.rogers@prairieopco.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34906 Initial Form 27 Document #: 403730354

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 #: 123-40353	County Name: WELD
Facility Name: WAAG 9	Latitude: 40.561444	Longitude: -104.706965	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID: _____	API #: 123-40356	County Name: WELD
Facility Name: WAAG 6	Latitude: 40.561670	Longitude: -104.706960	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID: _____	API #: 123-40357	County Name: WELD
Facility Name: WAAG 8	Latitude: 40.561520	Longitude: -104.706964	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID: _____	API #: 123-40360	County Name: WELD
Facility Name: WAAG 11	Latitude: 40.561291	Longitude: -104.706966	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID: _____	API #: 123-40361	County Name: WELD
Facility Name: WAAG 12	Latitude: 40.561214	Longitude: -104.706968	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID: _____	API #: 123-40362	County Name: WELD
Facility Name: WAAG 10	Latitude: 40.561367	Longitude: -104.706964	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID: _____	API #: 123-40364	County Name: WELD
Facility Name: WAAG 7	Latitude: 40.561600	Longitude: -104.706960	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 488362	API #: _____	County Name: WELD
Facility Name: WAAG 9 Historic Release	Latitude: 40.561444	Longitude: -104.706965	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 19	Twp: 7N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use crop land
 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

irrigation ditch 1000' NNE

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
No	GROUNDWATER	0	lab analysis
Yes	SOILS	150 sq ft	lab 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.

Between 11/13/25 and 11/26/25, the workplan was completed per approved SF27 document number 404212529. New excavation EX01 west sidewall grab soil sample EX01-SS-05@6' was submitted to Origins Laboratory in Denver, Colorado for ECMC Table 915-1 TPH (C6-C36), Organic Compounds in Soil, and SAR only. Laboratory analytical results confirm compliance and excavation EX01 at the WAAG 9 wellhead cut/cap is complete. Grab soil samples were submitted from all offsite flowline removal bellhole excavations and submitted to Origins for full Table 915-1 analysis. Laboratory analytical results confirmed elevated EC in FL-SS-18@4', Arsenic in FL-SS-22@4', pH in FL-SS-26@4', and EC in FL-SS-36@4'. WH07-FS-01@6' was re-sampled and submitted to Origins for SAR analysis only. Laboratory analytical result confirmed elevated SAR remains in place there. On 1/2/26 and 1/5/26, FL-SS-18@4', FL-SS-22@4', FL-SS-26@4', and FL-SS-36@4' we re-sampled and submitted to Origins for only the respective analyses they initially failed. Laboratory analytical result confirmed compliance at FL-SS-18@4', FL-SS-22@4', and FL-SS-26@4'. However, elevated EC remains at FL-SS-36@4'. See attached figures, tables, photo log, and laboratory analytical report for all work completed since previous SF27 document number 404436050 was submitted.

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):

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):

Additional Investigative Actions

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

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 67
Number of soil samples exceeding 915-1 9
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 150

NA / ND

-- Highest concentration of TPH (mg/kg) 1427
-- Highest concentration of SAR 10.8
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 6
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?

On 6/19/24, background grab soil samples were collected at 0.5', 4' and 6.5' bgs from 2 locations outside of the offsite wellhead pad, as well as from 2 locations outside of the tank battery location (remediation project number 34900) in the same field. On 11/12/25, additional background grab soil samples were collected at 0.5', 4' and 7' bgs from new locations outside of the offsite wellhead pad, as well as from 2 new locations outside of the tank battery location (remediation project number 34900) in the same field.

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?

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.

Wells have been P&A'd and flowlines removed.

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.

Excavation for offsite disposal

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 10

_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
_____ Excavate and onsite remediation
_____ 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.

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.

Reclamation will be in accordance with ECMC 1000 Series Rules or landowner direction.

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. 05/19/2023

Actual Spill or Release date, or date of discovery. 07/03/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/19/2024

Proposed site investigation commencement. 06/19/2024

Proposed completion of site investigation. 02/28/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/15/2025

Proposed date of completion of Remediation. 02/28/2026

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

Prairie would like to request ECMC approval to leave elevated EC in place at FL-SS-36@4' and elevated SAR in place at WH07-FS-01@6', as they are both below the root zone. Should ECMC approve, this project is complete.

Should ECMC not approve, Prairie would like to request ECMC approval for a reduced analysis of EC only for any additional soil samples at FL-SS-36@4' and SAR only for any additional soil samples at WH07-FS-01@6'.

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

Signed: David Castro

Title: Senior Project Manager

Submit Date: 03/27/2026

Email: dcastro@eagle-enviro.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: RICK ALLISON

Date: 05/05/2026

Remediation Project Number: 34906

COA Type**Description**

	<p>Samples WH07-FS-01 @ 6', FL-SS-17 @ 4', FL-SS-21 @ 5', FL-SS-42 @ 4' contain concentrations of PAH compounds in soil that exceed the Table 915-1 Protection of Groundwater Soil Screening Levels. While a pathway to groundwater may be eliminated, Operator shall define the vertical and horizontal extent of impacts that exceed the Table 915-1 Protection of Groundwater Soil Screening Levels.</p>
	<p>If the Operator proposes to leave material with elevated levels of EC and SAR in situ, the Operator shall define the vertical and lateral extent of impacts and provide a detailed Reclamation plan that includes, but is not limited to, soil analysis from adjacent undisturbed lands, revegetation techniques, site stabilization, and details of seeded species.</p> <p>Operator shall also define the root zone of the proposed vegetation and document through sampling the Table 915-1 Soil Suitability for Reclamation parameters in the root zone at the site.</p> <p>Operator shall continue to analyze all soil samples for the Table 915-1 Soil Suitability for Reclamation parameters.</p> <p>Operator will submit the Reclamation plan pursuant to Rule 915.b. on a Form 27 Supplemental Report for Director review.</p>
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**

404598756	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404598805	LABORATORY ANALYTICAL REPORT
404598806	LABORATORY ANALYTICAL REPORT
404598807	LABORATORY ANALYTICAL REPORT
404598808	LABORATORY ANALYTICAL REPORT
404598809	LABORATORY ANALYTICAL REPORT
404598810	LABORATORY ANALYTICAL REPORT
404598811	LABORATORY ANALYTICAL REPORT
404598812	LABORATORY ANALYTICAL REPORT
404598813	PHOTO DOCUMENTATION
404598814	MAP
404598815	SOIL SAMPLE LOCATION MAP
404598816	SOIL SAMPLE LOCATION MAP

404598817	SOIL SAMPLE LOCATION MAP
404598818	SOIL SAMPLE LOCATION MAP
404598819	SITE INVESTIGATION REPORT
404598820	ANALYTICAL DATA SUMMARY TABLE(S)
404598821	ANALYTICAL DATA SUMMARY TABLE(S)
404598822	ANALYTICAL DATA SUMMARY TABLE(S)
404647867	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 20 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Closure is not approved. ECMC changed the closure request from Yes to No.	05/05/2026

Total: 1 comment(s)