

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404553816
Receive Date:
02/23/2026

Report taken by:
Alexander Ahmadian

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: PAINTED PEGASUS PETROLEUM LLC | Operator No: 10711 | Phone Numbers |
| Address: 16820 BARKER SPRINGS RD #521 | | Phone: (303) 894-2100 |
| City: HOUSTON State: TX Zip: 77084 | | Mobile: (303) 905-5341 |
| Contact Person: James Hix - East OWP EPS | Email: james.hix@state.co.us | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39901 Initial Form 27 Document #: 404076045

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: LOCATION | Facility ID: 319992 | API #: _____ | County Name: ADAMS |
| Facility Name: W.E. POPE-62S62W 31NWNW (OWP) | Latitude: 39.837930 | Longitude: -104.374080 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: NWNW | Sec: 31 | Twps: 2S | Range: 62W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use 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? Yes

Other Potential Receptors within 1/4 mile

There is one DWR Permitted Water Well located within 1/4 mile. DWR Permit #195570- Receipt #0399312B (1998) [SWL = 33 ft bgs, Top of Perf Casing = 40 ft bgs, TD = 60 ft bgs, ~430 ft W]; Similar elevation: DWR Permit #2527725- Receipt #0514768 (Residential 2003) [SWL = 18 ft bgs, Top of Casing = 20 ft bgs, TD = 60 ft bgs, ~2010 ft NE]; DWR Permit #21435- Receipt #9002699 (Livestock 1964) [DTW = 8 ft bgs, Top of Perf Casing = 13 ft bgs, TD = 21 ft bgs, ~1850 ft SW]; Surface Water: Kiowa Creek 525 ft SE; NWI Mapped Wetlands: Riverine along Kiowa Creek drainage ~600 ft SE. There are no residential building units (RBU) w/in 1/4 mile. The Location lies within CPW Mapped HPH: Mule Deer Migration Corridor, Severe Winter Range, Winter Concentration Area. CPW HPH: Aquatic Native Species buffer lies ~215 ft SE along Kiowa Creek drainage.

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 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 |
|--------------|----------------|------------------|---------------------------------------|
| UNDETERMINED | GROUNDWATER | UNKNOWN | VISUALLY, FIELD SCREENING, ANALYTICAL |
| UNDETERMINED | SOILS | UNKNOWN | VISUALLY, FIELD SCREENING, 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.

This oil and gas Location is in the Colorado Energy and Carbon Management Commission (ECMC) Orphaned Well Program (OWP). This Form 27 Initial presents the site investigation activities and remediation workplan to be performed during decommissioning of Oil and Gas Facilities, specifically cut and cap sampling following plugging and abandonment (PA) of the well. Field screening will be performed of the four sidewalls and base of the wellhead excavation to investigate for evidence of E&P Waste impacts. At a minimum, soil samples will be submitted to an accredited environmental laboratory for analysis of Table 915-1 parameters from the excavation sidewall soils that exhibit E&P Waste impact; or from the expected downgradient sidewall in the absence of E&P Waste impact; and from the base of the excavation. Soil samples will be collected beneath the key pieces of production equipment, including but not limited to aboveground storage tanks (AST), produced water vaults (PWV), separators, manifolds, flowline risers, and areas where E&P Waste impacts are most likely. Flowline trenches will be observed for evidence of historic spills/releases. Soil samples will be collected and analyzed in accordance with Colorado ECMC 900 Series Rules.

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):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds [metals (As, Ba, Cd, Cu, Cr6+, Pb, Ni, Ag, Zn) and soil suitability for reclamation parameters (pH, EC, SAR, hot water soluble boron)].

Proposed Groundwater Sampling

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

If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this investigation.

Additional Investigative Actions

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

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 12
Number of soil samples exceeding 915-1 7
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 1752

NA / ND

-- Highest concentration of TPH (mg/kg) 149610
-- Highest concentration of SAR 19.9
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed _____
Number of groundwater samples exceeding 915-1 _____

____ Highest concentration of Benzene (µg/l) _____
____ Highest concentration of Toluene (µg/l) _____
____ Highest concentration of Ethylbenzene (µg/l) _____
____ Highest concentration of Xylene (µg/l) _____
____ 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?

Site-specific background samples were not collected as part of this site investigation. Site-specific background samples will be collected from undisturbed areas away from historic oil and gas facilities. Background samples will be submitted to an accredited environmental laboratory for analysis of Table 915-1 metals and soil suitability for reclamation parameters.

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?

Further site investigation is required to delineate the lateral and vertical extent of E&P Waste impacts discovered at the wellhead, flowlines, and tank battery. Highest TPH results were reported beneath the produced water vault (PWV) in sample, 319992-P-PWV-S5 at 6 ft bgs (TPH = 149610 mg/kg). Analytical results for the wellhead excavation north wall soil sample, 319992-P-NW-S2 at 1 ft bgs TPH = 1069 mg/kg were above Table 915-1 cleanup concentrations as were several of the flowline samples. Flowline 1, 319992-U-FL1-1-S7 at 4.33 ft bgs (TPH = 1149 mg/kg); 319992-U-FL1-13-S9 at 4 ft bgs (TPH = 1094 mg/kg); Flowline 2, 319992-U-FL2-S10 at 4 ft bgs (1050.4 mg/kg), and 319992-U-FL2-5-S12 at 2.5 ft bgs (1462 mg/kg). Benzene, toluene, ethylbenzene, xylenes (BTEX) concentrations were reported above Table 915-1 Residential SSL in sample 319992-P-PWV-S5 at 6 ft bgs. Concentrations of benzo(a)pyrene were reported above the Table 915-1 Residential SSL of 0.11 mg/kg in the PWV sample and all of the flowline samples, and other polycyclic aromatic hydrocarbon (PAH) compounds were also reported above their Table 915-1 Residential SSL in several samples. Arsenic was reported above the Table 915-1 Residential arsenic SSL in all samples; however, this may be related to naturally occurring background arsenic. Barium was reported above the Table 915-1 Protection of Groundwater SSL in 9 of the 12 samples. Lead was reported above the Table 915-1 Protection of Groundwater SSL in two samples. The soil pH was reported at 5.7 s.u. in sample 319992-P-TANK-E-S3 at 1 ft and was reported above the upper Table 915-1 pH level in three samples from the Tank Battery and PWV. SAR was reported above the Table 915-1 Soil Suitability for Reclamation level in five of the 12 samples. Site-specific background samples are required to assess natural background to compare with these results.

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.

If E&P Waste impacts are encountered during decommissioning of Oil and Gas Facilities, approximately 10 cubic yards of impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

REMIEDIATION 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.

If E&P Waste impacted soils are encountered, approximately 10 cubic yards of the soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under an approved supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site conditions.

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 # _____
- _____ 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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

A Form 27 Supplemental will be submitted within 90 days of receipt of results.

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.

The former Painted Pegasus Petroleum LLC - W.E. Pope #2 (OWP) is in the ECMC Orphaned Well Program (OWP). The former Operator's bond(s) and other funding sources will be used to plug and abandon (PA) the well, decommission oil and gas facilities, investigate, remediate, and reclaim the Location.

Operator anticipates the remaining cost for this project to be: \$ 131000 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

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? 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.

The Colorado ECMC OWP will prepare a reclamation plan to reclaim this oil and gas location in accordance with 1000 Series Rules including grading/recontouring of disturbed areas. The reclamation plan will be implemented per ECMC 1000 Series Rules and prioritized based on OWP ranking, project funding, and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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. 01/22/2025

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/23/2025

Proposed site investigation commencement. 01/15/2026

Proposed completion of site investigation. 06/30/2027

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

The former PAINTED PEGASUS PETROLEUM LLC - 10711 W.E. POPE #2 (OWP) oil and gas well (API #05-001-07561) W.E. POPE-62S62W 31NWNW (Location ID #319992) is in the ECMC Orphaned Well Program ("OWP"). The OWP contractors discovered a historic release (Spill/Release Point #492906) beneath the pit/produced water vault during tank battery decommissioning activities conducted on 01/15/2026. Pre-plugging methane monitoring identified a leak at the wellhead at a rate of 8.7 grams per hour (g/hr). Post-plugging methane monitoring conducted at least five days following plugging and abandonment (PA) did not detect leaks.

This Form 27 Supplemental presents the results of the wellhead cut and cap samples and sampling beneath the key pieces of equipment conducted during the tank battery decommissioning and flowline removal. Analytical results for the wellhead excavation north wall soil sample, 319992-P-NW-S2 at 1 ft bgs TPH = 1069 mg/kg were above Table 915-1 cleanup concentrations as were several of the flowline samples. The TPH results for the wellhead floor sample, 319992-P-WH-S1 at 6 ft bgs were below Table 915-1. The highest TPH results were reported beneath the produced water vault (PWV) in sample, 319992-P-PWV-S5 at 6 ft bgs (TPH = 149,610 mg/kg). Flowline 1, 319992-U-FL1-1-S7 at 4.33 ft bgs (TPH = 1149 mg/kg); 319992-U-FL1-13-S9 at 4 ft bgs (TPH = 1094 mg/kg); Flowline 2, 319992-U-FL2-S10 at 4 ft bgs (1050.4 mg/kg), and 319992-U-FL2-5-S12 at 2.5 ft bgs (1462 mg/kg).

Benzene, toluene, ethylbenzene, xylenes (BTEX) concentrations were reported above Table 915-1 Residential SSL in sample 319992-P-PWV-S5 at 6 ft bgs. Concentrations of benzo(a)pyrene were reported above the Table 915-1 Residential SSL of 0.11 mg/kg in the PWV sample and all of the flowline samples. Other PAH compounds were also reported above their Table 915-1 Residential soil screening level (SSL) in several samples. Arsenic was reported above the Table 915-1 Residential arsenic SSL in all samples; however, this may be related to naturally occurring background arsenic. Barium was reported above the Table 915-1 Protection of Groundwater (POGW) SSL in 9 of the 12 samples. Lead was reported above the Table 915-1 POGW SSL in two samples. The soil pH was reported at 5.7 s.u. in sample 319992-P-TANK-E-S3 at 1 ft and was reported above the upper Table 915-1 pH level in three samples from the Tank Battery and PWV. The SAR was reported above the Table 915-1 Soil Suitability for Reclamation SAR level in five of the 12 samples. Further site investigation is required to delineate the lateral and vertical extent of E&P Waste impacts discovered at the wellhead, flowlines, and tank battery. Site-specific background samples are required to compare with the metals and soil suitability for reclamation results.

Groundwater is expected to lie at less than 20 ft bgs. The location is in proximity to a CPW mapped bald eagle nest HPH. Further site investigation and remediation performed during a future phase of OWP work will proceed under Remediation Project #39901.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 02/23/2026

Email: james.hix@state.co.us

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: Alexander Ahmadian

Date: 05/06/2026

Remediation Project Number: 39901

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**

| | |
|-----------|--------------------------------|
| 404553816 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 404553946 | ANALYTICAL RESULTS |
| 404553961 | MONITORING REPORT |
| 404553962 | MONITORING REPORT |
| 404553965 | PHOTO DOCUMENTATION |
| 404553995 | SITE INVESTIGATION REPORT |

Total Attach: 6 Files

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

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

Total: 0 comment(s)