

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404372029

Receive Date:
09/29/2025

Report taken by:
Kilian Collins

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>HIGHPOINT OPERATING CORPORATION</u> | Operator No: <u>10071</u> | Phone Numbers |
| Address: <u>555 17TH ST STE 3700</u> | | Phone: <u>(720) 315-8934</u> |
| City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u> | | Mobile: <u>()</u> |
| Contact Person: <u>Luke Kelly</u> | Email: <u>LKelly@Civiresources.com</u> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 45117 Initial Form 27 Document #: 404372029

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>TANK BATTERY</u> | Facility ID: <u>436165</u> | API #: _____ | County Name: <u>WELD</u> |
| Facility Name: <u>RSU Anschutz Fed 4-62-2_1 SWNW</u> | Latitude: <u>40.344906</u> | Longitude: <u>-104.301722</u> | |
| | ** correct Lat/Long if needed: Latitude: <u>40.345226</u> | Longitude: <u>-104.300718</u> | |
| QtrQtr: <u>SWNW</u> | Sec: <u>2</u> | Twps: <u>4N</u> | Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

NA

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X 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

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Row 1: Yes, SOILS, TBD, 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.

9/29/2025 Update - Due to the size of the updated summary and to preserve the initial project narrative please see the attached Initial Action Summary
A compromised produced water tank released approximately 100 bbls of produced water inside of a lined secondary containment. The tank will be isolated, bottomed out, blinded, and marked out of service. This form is being submitted for Spill Point ID: 480912. There was an issue with the coordinates associated with the original Form 19 that would not allow it to be associated with the Form 27.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

X Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

See attached soil sampling plan

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 37
Number of soil samples exceeding 915-1 22
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 3.63
-- Highest concentration of SAR 97.3
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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
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?

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?

Yes, please see the Proposed Sampling Plan section of this form for details on future sampling.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The impacted material will be removed through mechanical excavation.

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.

Once vertical and lateral delineation is complete and a project scope is developed; HighPoint will outline a detailed remediation strategy in a subsequent Form 27.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 115

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

Natural Attenuation
 Other _____

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

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 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.

The General Liability coverage within the Civitas Resources, Inc. insurance program includes coverage for bodily injury, property damage, and pollution clean-up costs arising from qualifying pollution events of a sudden and accidental nature subject to a \$1,000,000 per occurrence limit and \$2,000,000 aggregate limit. The Civitas Resources, Inc. insurance program includes Excess Liability coverage of \$110,000,000 per occurrence and in the aggregate which sits over the sudden and accidental pollution within the General Liability coverage. It is the opinion of Civitas Resources, Inc. that this total tower of limit is adequate to address the costs of remediation associated with any qualifying pollution event.

Operator anticipates the remaining cost for this project to be: \$ 20000

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 115

E&P waste (solid) description E&P impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge

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

E&P waste (liquid) description NA

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: NA

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 release occurred on an active oil and gas location. Reclamation will take place following facility decommissioning in accordance with ECMC 1000 Series 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. 10/12/2021

Actual Spill or Release date, or date of discovery. 10/12/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/13/2021

Proposed site investigation commencement. 12/28/2025

Proposed completion of site investigation. 03/28/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/26/2026

Proposed date of completion of Remediation. 09/24/2026

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

In accordance with Rule 206.a, Civitas Resources, Inc. completed an assessment and identified discrepancies in data previously submitted to the ECMC for this site that were prepared by a third-party consultant without the knowledge and beyond the reasonable control of Civitas Resources, Inc. The following discrepancies were identified in the third-party consultant's report (document #402994387) attached to ECMC Form 19 #402994356.

- Sample ID CS-FS-04@7': The SAR concentration of 10.7 was altered to 1.02, the calcium concentration of 4.69 was altered to 6.27, the magnesium concentration of 1.06 was altered to 2.29, and the sodium concentration of 18.2 was altered to 2.11 within the lab report (Origins # Y203122-01) and on pages 5, 10, and 140.
- Sample ID CS-SS-12@6': The SAR concentration of 7.52 was altered to 2.29, the calcium concentration of 8.67 was altered to 12.7, the magnesium concentration of 2.32 was altered to 5.27, and the sodium concentration of 17.6 was altered to 6.86 within the lab report (Origins # Y203122-01) and on pages 5, 10, and 133.
- Sample ID CS-SS-13@6': The SAR concentration of 8.59 was altered to 0.829, the calcium concentration of 7.70 was altered to 4.50, the magnesium concentration of 2.32 was altered to 5.27, and the sodium concentration of 18.9 was altered to 1.48 within the lab report (Origins # Y203122-01) and on pages 5, 10, and 134.

The analytical result alterations resulted in exceedances becoming non-exceedance. The identified data anomalies were allegedly altered by the third-party consultant.

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

Signed: Luke Kelly

Title: Env. Advisor

Submit Date: 09/29/2025

Email: LKelly@Civiresources.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: Kilian Collins

Date: 05/20/2026

Remediation Project Number: 45117

COA Type**Description**

| | |
|-------|--|
| | More recent forms have been submitted. Refer to them for applicable COAs and comments. |
| 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**

| | |
|-----------|---|
| 404372029 | INVESTIGATION/REMEDATION WORKPLAN (INITIAL) |
| 404372039 | SITE INVESTIGATION PLAN |
| 404372058 | SOIL SAMPLE LOCATION MAP |
| 404372060 | SITE INVESTIGATION PLAN |
| 404372080 | ANALYTICAL RESULTS |
| 404372086 | ANALYTICAL RESULTS |
| 404372096 | SOIL SAMPLE LOCATION MAP |
| 404372098 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404372100 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404372101 | REMEDIAL ACTION PLAN |
| 404665517 | FORM 27-INITIAL-SUBMITTED |

Total Attach: 11 Files

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

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

Total: 0 comment(s)