



July 15, 2020

Mr. Paul Herring
Top Operating Co.
3609 Wadsworth Blvd, Ste 340
Lakewood, CO 80235

**Field Inspection Report (FIR) Document 689501048 Corrective Action Response
Stamp 31-2
Lat./Long. 40.187067/-105.048726
NE 1/4 NW 1/4 Sec.31 T3N R68W 6PM
Weld County, Colorado
Facility ID 426981
Remediation Project #15517**

Dear Mr. Herring,

Please find below a timeline of events associated with the Stamp 31-2 site investigation.

TIMELINE OF EVENTS

May 14, 2020:

On May 14, 2020, Top Operating Company (TOP) observed an aboveground crack in the fiberglass partially produced water vessel located at the Stamp 31-2 site (Site). Upon further investigation via excavation, stained soil was observed around the fiberglass partially buried produced water vessel. TOP submitted a *Site Investigation and Remediation Workplan* (Initial Form 27 – Document #402398543) to the Colorado Oil and Gas Conversation Commission (COGCC) on May 14, 2020. COGCC Environmental Protection Specialist Kari Oakman approved the Initial Form 27 Report (Remediation Project #15517) on May 15, 2020. The following two conditions of approval (COA) were included on the approved Initial Form 27:

- If field screening is to be used in conjunction with laboratory reports to define any horizontal and vertical impacts, operator shall provide field screening readings when submitting the Form 27 Supplemental Site Investigation.
- Operator shall submit a Form 27 Supplemental Report within 45 days of performing this environmental investigation.

May 15, 2020:

On May 15, 2020, within 24 hours of the discovery of the release, TOP reported the release via email to the COGCC (Kari Oakman) and to the local government/surface owner (City of Longmont - Brad Schol). TOP also submitted a *Spill/Release Report* (Initial /w Supplemental Form 19 – Document #402398518) on May 15, 2020. The Form 19 report was closed by the COGCC as work would proceed under the approved Form 27 Remediation Project #15517. The following conditions of approval (COA) was included on the Initial /w Supplemental Form 19 approved on May 18, 2020:

- Based on review of the information submitted in project #15517 which is ongoing at this time, it is concluded that the proposed investigation activities and proposed remedial action in the approved site investigation plan will be adequate to remediate impacted soils and groundwater at the site of the spill. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.

TOP commenced approved remediation source removal activities via excavation and hydrovac (groundwater removal) on May 15, 2020. Per the approved Form 27, any soil impacted above COGCC Table 910-1 regulatory limits would be excavated from the Site and disposed at an approved facility.

May 19, 2020:

On May 19, 2020, the COGCC (Kari Oakman) completed a field inspection at the Site. Field Inspection Form (Document #689501048) was submitted on May 19, 2020 with the following two comments and one corrective action:

- Comment #1: COGCC Environmental Inspection of Spill ID 476473 (CL) and Remediation Project #15517. Photos attached to document the site at time of inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.
- Comment #2: No environmental personnel were on site at the time of inspection. Groundwater was observed in the western portion of the excavation. Stained soil was observed in portions of the north and south sidewall from approximately 3.5' to 5' (floor).
- Corrective Action: Upon completion of soil excavation Operator shall submit a Supplemental Form 27 including confirmation soil sample results, waste manifests for removal of impacted material (soil and groundwater), and a plan for full delineation of groundwater impacts and continued groundwater monitoring. Due date of July 3, 2020.

Field Inspection Form (Document #689501048) was sent directly to TOP as EAGLE was unaware of the FIR and the corrective action due July 3, 2020.

May 22, 2020:

TOP and EAGLE completed a conference call with Brad Schol of the City of Longmont to update Brad on the status of the excavation and soil analytical results obtained at that time.

May 28, 2020:

On May 28, 2020, EAGLE spoke with Kari Oakman via phone and discussed submitting a Supplemental Form 27 Report with the current soil and groundwater data collected from the Site. Per EAGLE's conversation with Kari, Kari directed EAGLE to wait until all site data was collected to submit the Supplemental Form 27 Report. During EAGLE's conversation with Kari the July 3, 2020 deadline was not mentioned or discussed. EAGLE was working under the approved Form 27 COA, stating a Supplemental Form 27 Report was due to the COGCC within 45 days of performing the environmental investigation.

June 8, 2020:

On June 8, 2020, the COGCC (Kari Oakman) completed a field inspection at the Site. Field Inspection Form (Document #689501061) was submitted on June 10, 2020 with the following two comments:

- Comment #1: COGCC Environmental Inspection of Spill ID 476473 (CL) and Remediation Project #15517. Wellhead and adjacent battery not inspected. Photos attached to document the site at time of inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.
- Comment #2: No environmental personnel were on site at the time of inspection. Groundwater was observed on the lowest levels of the floor of the excavation. Stained soil was in the wall of the southeastern portion of the excavation. Work was progressing to the south; areas to be north remained open and orange safety fencing was in place. Tracking pad has been placed on the access road to mitigate dirt being tracked offsite. See attached photos.

May 15 through June 30, 2020:

Eagle Environmental Consulting, Inc. (EAGLE) provided excavation oversight and completion of soil and groundwater sampling during source removal activities completed from May 15, 2020 through June 30, 2020 (59 soil samples and 1 groundwater sample were collected for laboratory analysis). In addition, per the request of the City of Longmont, TOP allowed split-sampling of soil samples collected at the Site by the City of Longmont's environmental consultants Terracon Consultants, Inc. (Terracon). EAGLE coordinated split-sampling with Terracon for all excavation (sidewall and floor) confirmation soil samples throughout source removal activities.

Confirmation soil sampling associated with the environmental investigation per the approved Form 27 was completed on June 30, 2020. Final soil analytical data was received on July 1, 2020 (expedited 48-hour turnaround time on samples collected June 30, 2020). Backfilling activities commenced on July 1, 2020 and are still currently being completed at the Site. Per the COA in the approved Form 27 (Document #402398543/Remediation Project #15517), a Supplemental Form 27 Report would be due to the COGCC by August 14, 2020.