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Ms. Kiefer,

As part of its Lowry Ranch CAP (amended version submitted to the ECMC in April 2023), Civitas contemplated construction and drilling of the State Sneffels oil and gas site in Section 3, T5S R65W, near Quincy Ave., in unincorporated Arapahoe County. The State Sneffels site was designed to include up to 10 horizontal wellbores, drilling down from the surface location in Section 3 and then approximately 3.25 miles westward. As designed, the last ~0.75 miles of the State Sneffels wellbores would have drilled under the Lowry Landfill Superfund site, at a depth of approximately 8000' below the surface. The State Sneffels surface location is over 2.5 miles east of the Superfund Site.

Civitas received a letter from the EPA in May 2023 citing concerns about the development plan, and, in June 2023, met with representatives of the EPA, CDPHE, the City of Denver, and Waste Management to discuss the cited concerns. The EPA's concerns centered around drilling and hydraulically fracturing under the Lowry Landfill Superfund Site, and the effect that those operations might have on the sealing layer under the Site.

While there is no evidence that drilling or hydraulically fracturing at a depth thousands of feet beneath the Superfund Site poses any heightened risk of contamination due to the extraction process, Civitas acknowledges that the Lowry Landfill Superfund Site is fundamentally different than nearly all other potential areas considered for oil and natural gas development, and that the unique nature of this particular Superfund Site necessitates and justifies special concessions. After careful consideration of the EPA's concerns and the existing environmental contamination at this Site, Civitas is committing to not penetrating the subsurface under the Superfund Site by limiting the horizontal bores of the State Sneffels wells to approximately 2.25 miles, in order to avoid the Site. This precaution is not due to any risk associated with oil and natural gas development, but a desire to protect the Superfund remedy that is in place and operating effectively. Subsequent regulatory filings to the ECMC will reflect this updated development plan.

Civitas deeply appreciates the willingness of the EPA, CDPHE, City of Denver, and Waste Management to share information about the Superfund Site and to engage in consultation around their concerns, and hopes that this development plan modification will mitigate those concerns.

Regards,

A handwritten signature in dark ink, appearing to read "Dan Harrington", written over a horizontal line.

Dan Harrington  
Asset Development Lead  
Civitas Resources