

State of Colorado  
Energy & Carbon Management Commission

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Report taken by:  
Abdul Elnajdi

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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	<b>Phone Numbers</b>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>jason.davidson@chevron.com</u>	Phone: <u>(970) 939-1929</u>
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25040 Initial Form 27 Document #: 403160963

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>WELL</u>	Facility ID: _____	API #: <u>123-13197</u>	County Name: <u>WELD</u>
Facility Name: <u>WPF III A18-13A</u>	Latitude: <u>40.480489</u>	Longitude: <u>-104.599693</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>18</u>	Twp: <u>6N</u>	Range: <u>64W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland  
 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? No

**Other Potential Receptors within 1/4 mile**

Colorado Division of Water Resources (DWR) well permit number 231595 0.19mi SW  
Well within Mule Deer Severe Winter Range HPH  
Freshwater Emergent Wetland 0.21mi E, 0.18mi NE  
Riverine 0.15mi NE, 0.20mi E  
Farm Structures 0.15mi NW, 0.13mi N, 0.12mi E, 0.22mi SE, 0.17mi SW  
Residential Structures 0.13mi N, 0.18mi NW, 0.14/0.17mi SW, 0.09/0.22mi SE

# 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 checked="" 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	NA	Lab analysis or field screening, if encountered
UNDETERMINED	SOILS	To be determined	Soil sampling and 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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the WPF III A18-13A wellhead cut and cap and flowline removal. On October 19, 2022, initial wellhead characterization sampling was completed following cut and cap operations. Five soil samples were collected and field screened from the wellhead excavation; four from the excavation sidewalls and one from the base of the excavation. The base sample was submitted for analysis of ECMC Table 915-1 organic and Soil Suitability for Reclamation (SSR) constituents. One background soil sample was also collected and submitted for analysis of SSR constituents. See Form 27 Document 403833160 and the associated Site Investigation Report attachment (Document 403833179) for details.

On January 10, 2023, initial flowline characterization was completed during the removal of approximately 453 feet of flowline. Three soil samples were collected at the flowline cut point bellholes and one was collected at the separator connection point for field screening. One flowline corridor sample and the separator sample were submitted for analysis of Table 915-1 organics and SSRs. See Form 27 Document 403697659 and the associated Site Investigation Report attachment (Document 403697661) for details.

On November 26, 2024, a supplemental site investigation was completed to delineate potential impacts at the wellhead. Five soil borings were advanced adjacent to and surrounding the wellhead and samples were collected at 6-7 feet and 7-8 feet below ground surface (bgs). Samples were field screened and submitted for analysis of all Table 915-1 constituents. Additionally, three background soil borings were advanced. Samples were collected at 6-7 feet and 7-8 feet bgs and submitted for all Table 915-1 inorganic constituents. See the attached Site Investigation Report for details.

## 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 ):

Additional soil samples will be collected as needed to delineate the extent of potential soil impacts identified by investigation activities. Soil samples will be submitted for analysis of all Table 915-1 soil constituents of concern. Background samples may be collected to further characterize native levels of inorganic constituents at the Location.

### Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation, a grab groundwater sample will be collected and analyzed for all organic and inorganic compounds per Table 915-1.

### 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 ):

Visual inspection at the wellhead and flowline areas occurred during investigation activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 10

Number of soil samples exceeding 915-1 9

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 100

### NA / ND

ND Highest concentration of TPH (mg/kg)           

-- Highest concentration of SAR 8.52

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

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?

On October 19, 2022, one background sample was collected and analyzed for Table 915-1 SSRs. On November 26, 2024, six background soil samples were collected and analyzed for all Table 915-1 inorganic constituents.

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?

Supplemental site investigation (SSI) activities will be conducted to delineate the extent of potential soil impacts identified by investigation activities. Delineation soil samples will be collected and analyzed for all Table 915-1 constituents. Additional background samples will be collected and analyzed for all Table 915-1 inorganics.

## 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.

No impacted material caused by oil and gas operations has been removed at this time.

### 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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the WPF III A18-13A wellhead cut and cap and flowline removal. On October 19, 2022, initial wellhead characterization sampling was completed following cut and cap operations. Five soil samples were collected and field screened from the wellhead excavation; four from the excavation sidewalls and one from the base of the excavation. The base sample was submitted for analysis of ECMC Table 915-1 organic and SSR constituents. Analytical results indicated an exceedance of electrical conductivity (EC). One background soil sample also indicated an EC exceedance. See Form 27 Document 403833160 and the associated Site Investigation Report attachment (Document 403833179) for details.

On January 10, 2023, initial flowline characterization was completed during the removal of approximately 453 feet of flowline. Three soil samples were collected at the flowline cut point bellholes and one was collected at the separator connection point for field screening. One flowline corridor sample and the separator sample were submitted for analysis of Table 915-1 organics and SSRs. The flowline corridor sample indicated compliance with applicable standards. Impacts identified at the separator are being addressed under REM 25398 per approved Form 27 Document 403697659.

On November 26, 2024, a supplemental site investigation was completed to delineate potential impacts at the wellhead. Five soil borings were advanced adjacent to and surrounding the wellhead and samples were collected at 6-7 feet and 7-8 bgs. Samples were field screened and submitted for analysis of all Table 915-1 constituents. Analytical results indicated various inorganic exceedances of applicable standards. Background samples also indicated inorganic exceedances. See the attached Site Investigation Report for details.

**Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

Groundwater was not encountered during the site investigation.

# 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 Quarterly 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.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policy MWZZ 316714) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to on the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: \$ 50000

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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.

Reclamation will be in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes \_\_\_\_\_

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. 10/19/2022

Proposed date of completion of Reclamation. 10/31/2026

## 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. 07/21/2022

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/19/2022

Proposed site investigation commencement. 09/16/2022

Proposed completion of site investigation. 07/31/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/19/2022

Proposed date of completion of Remediation. 12/31/2025

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:

The implementation schedule has been changed due to the decommissioning of the WPF III A18-13A wellhead and flowline and necessity for additional SSI activities adjacent to the wellhead and flowline.

## OPERATOR COMMENT

This form has been submitted to provide a quarterly update for Remediation Project 25040. A supplemental site investigation was conducted on November 26, 2024. See the attached Site Investigation Report for investigation details.

Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical reports from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original reports with additional protections (Reissued Reports). The Reissued Reports were received directly from the lab on February 13, 2025, which includes a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance. The metadata associated with the Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Reports associated with the November 26, 2024 investigation are attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information.

Remediation and site investigation, previously directed by Eagle Environmental, is now under the direction of Confluence Compliance Companies (Confluence). Confluence has thoroughly reviewed all laboratory analytical reports and data as it relates to this project. Reissued Reports containing all data collected to date for the project have been cross-checked against the corresponding original laboratory reports and data presented in Site Investigation Reports. No discrepancies were identified during the review.

Confluence is working with Noble to establish a site investigation schedule which will be reported in a subsequent Form 27 by June 18, 2025. Quarterly reporting will be conducted until closure criteria are achieved for the remediation project.

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

Signed: Chris McKisson

Title: Rem. Program Manager

Submit Date: 03/20/2025

Email: chris.mckisson@confluence-cc.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: Abdul Elnajdi

Date: 03/24/2025

Remediation Project Number: 25040

## COA Type

## Description

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.
	The background sample (Background01 @ 3') with an EC of 14.8 is anomalous. This BKG is not a valid background sample for comparison. The operator shall delete this background sample and collect and submit for laboratory analysis a soil sample collected from the areas most unlikely to have been impacted during the operational life of the wellhead.
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
404123503	FORM 27-SUPPLEMENTAL-SUBMITTED
404125618	SITE INVESTIGATION REPORT
404125884	ANALYTICAL RESULTS
404125885	ANALYTICAL RESULTS

Total Attach: 4 Files

## General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)

Date Run: 3/24/2025 Doc [#404123503]

Page 8 of 8