

State of Colorado  
Energy & Carbon Management Commission

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404154865  
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Report taken by:  
RICK ALLISON

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: NOBLE ENERGY INC	Operator No: 100322	<b>Phone Numbers</b>
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 730-7281
City: DENVER State: CO Zip: 80202		Mobile: ( )
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35726 Initial Form 27 Document #: 403748270

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

Yes Multiple Facilities

Facility Type: LOCATION	Facility ID: 302633	API #: _____	County Name: WELD
Facility Name: DILLARD 10-44	Latitude: 40.582250	Longitude: -104.528480	
** correct Lat/Long if needed: Latitude: 40.582305		Longitude: -104.526276	
QtrQtr: SESE	Sec: 10	Twp: 7N	Range: 64W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 488901	API #: _____	County Name: WELD
Facility Name: Dillard 10-44	Latitude: 40.582466	Longitude: -104.526246	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 10	Twp: 7N	Range: 64W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Rangeland

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**

Pronghorn Winter Concentration Area (1202.d)  
Riverine 355ft SW, Stream/River 365ft SW, Lake/Pond 340ft SW, 0.10mi S, 0.16mi NW  
Oil & Gas Structure 0.25 NE  
Active PD Colony within 660ft

# 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 and Field Screening, if encountered
Yes	SOILS	Refer to ECMC Doc. No. 404039219	Lab Analysis and Field Screening

## INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

A site investigation was conducted pursuant to ECMC Rule 911 at the Dillard 10-44 Facility and Tank Battery location. On 12/20/2024, the tank battery was decommissioned in accordance with ECMC rules. Laboratory soil samples were collected from the partially-buried produced water vessel excavation base (PVW01-B@4') and N, W, S, & E sidewalls (PVW01-N@2.5' to PVW01-S@2.5') and from the above ground storage tank (AST) excavation base (AST01-B@4') and N, W, S, & E sidewalls (AST01-N@2.5' to AST01-S@2.5'). Lab samples were also collected beneath the separator risers at the dump line (SEP01-DL@3') and at the flowline (SEP01-FL@3'). A field screening sample was collected beneath the flare location (FLARE01@0-6"). An additional laboratory sample was collected (WC01@0-6") from an area of surface soils exhibiting hydrocarbon odor. Due to these field indicators (odor and PID: 26.7 ppm), sample WC01@0-6" was reported as a potential historic release.

Sampling deviated from the sampling plan proposed in Initial Form 27 # 403748270; a surface sample was unable to be taken and additional locations were sampled beneath the AST due to necessity for excavation to retrieve and remove an oil dump line. Additional sample WC01@0-6" was collected from an area exhibiting hydrocarbon odor located southwest of the AST. Infrastructure present at the facility upon arrival included the AST, produced water vessel, separator, and flare. Any other infrastructure marked on the proposed sampling plan was removed prior to decommissioning and not sampled.

## 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 ):

All sampling was conducted in accordance to the Initial Action Summary of this Form 27. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

### 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 will be collected and analyzed for all organic and inorganic compounds per ECMC 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 tank battery area occurred during abandonment activities. Field personnel field screened disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of the tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to a previous Form 27 (ECMC Document # 404039219). A summary of flowline decommissioning activities was submitted under Remediation # 35728 (Dillard 10-44 Wellhead/Flowline, API # 123-29510) on Supplemental Form 27 # 404039214.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 13

Number of soil samples exceeding 915-1 13

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

Approximate areal extent (square feet) 400

### NA / ND

-- Highest concentration of TPH (mg/kg) 131.5

-- Highest concentration of SAR 2.25

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

### 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?

Seven background soil samples were collected from two distinct locations (BKG01, BKG02) near the facility and the associated Dillard 10-44 flowline and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths approximately 0.5 to 4 feet below ground surface and the lithology was noted to be similar to that observed in site samples. The maximum background concentration for pH was observed to be 8.69. The maximum background concentrations with a 1.25x multiplier applied for arsenic and barium were calculated to be 6.03 mg/kg and 185 mg/kg, respectively. All arsenic and barium concentrations observed during decommissioning were below background levels.

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?

Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, background soil samples (BKG03-BKG07) will be collected to determine if pH values are attributed to native soil conditions at the site. Soil samples will be collected and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Samples will be collected under the Dillard 10-44 Wellhead/Flowline (Rem # 35728) in conjunction with a remedial excavation at the flowline. A proposed soil boring map is attached to this Form 27. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

## 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.

The 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, and/or 1-methylnaphthalene (M) exceedances observed at sample locations AST01-E@2.5', PVW01-B@4', PVW01-E@2.5' and WC01@0-6" will be removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

### REMEDICATION 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.

Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The results of the remedial excavation will be submitted on a subsequent Form 27.

Additional background sampling will be conducted to determine if pH levels are attributed to native background concentrations. Background soil samples will be collected under the associated Dillard 10-44 Wellhead/Flowline (Rem # 35728) in conjunction with a remedial excavation at the flowline. A proposed soil boring map is attached to this Form 27.

### Soil Remediation Summary

**In Situ**

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

**Ex Situ**

- \_\_\_\_\_ 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.

Groundwater was not encountered during tank battery decommissioning activities.

# 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 2Q25 Timeline Update, Supplemental Site Investigation & Source Mass Removal Proposal

## 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 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. 12/20/2024

Proposed date of completion of Reclamation. 08/29/2026

## 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. 04/04/2024

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/20/2024

Proposed site investigation commencement. 08/28/2025

Proposed completion of site investigation. 08/29/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/29/2025

Proposed date of completion of Remediation. 02/28/2026

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:

'Proposed completion of site investigation' date is being updated to reflect the schedule to complete the remedial excavation activities and supplemental site investigation (SSI). The SSI is tentatively scheduled for 08/28/2025. The ECMC will be updated on a subsequent Form 27 with the results of the remedial excavation and SSI.

**OPERATOR COMMENT**

This Form 27 is being submitted as a Second Quarter 2025 timeline update for the completion of the remedial excavation and a supplemental site investigation (SSI) for the former Dillard 10-44 Facility and Tank Battery.

As per the COA on the previous Supplemental Form 27 document # 403999384, this Form 27 is strictly reporting on the former Dillard 10-44 facility/tank battery under Rem # 35726 and Facility ID 302633. Any Form 27s submitted under Rem # 35728 and API #123-29510 only contain information and data pertaining to the wellhead, wellhead cut and cap, flowline, and flowline infrastructure (excluding sampling of the flowline separator) for the Dillard 10-44 Wellhead/Flowline. See Supplemental Form 27 Document # 404039214 under Rem # 35728 for a summary of the Dillard 10-44 flowline decommissioning and Document # 403883279 under Rem # 35728 for a summary of the Dillard 10-44 wellhead cut and cap.

The 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, and/or 1-methylnaphthalene exceedances observed at sample locations AST01-E@2.5', PWV01-B@4', PWV01-E@2.5' and WC01@0-6" will be removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the remedial excavation, background soil samples (BKG03-BKG07) will be collected to determine if pH concentrations are attributed to native soil conditions at the site. Background soil samples will be collected under the Dillard 10-44 Wellhead/Flowline (Rem # 35728) in conjunction with a remedial excavation at the flowline. A proposed SSI map is attached to this Form 27.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The SSI is tentatively scheduled to be conducted on 08/28/2025. The results of the remedial excavation and SSI will be submitted on a subsequent Form 27.

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

Signed: Eric Vonde

Title: Environmental Consultant

Submit Date: 04/21/2025

Email: Tas-Chevron-5@tasman-geo.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: RICK ALLISON

Date: 07/16/2025

Remediation Project Number: 35726

**COA Type****Description**

0 COA	
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**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**

404154865	FORM 27-SUPPLEMENTAL-SUBMITTED
404155014	SITE INVESTIGATION PLAN

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)