

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

404039219

Receive Date:

01/30/2025

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 ECOM 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 | Phone Numbers |
| Address: 1099 18TH STREET SUITE 1500 | | Phone: (970) 730-7281 |
| City: DENVER | State: CO | Zip: 80202 |
| Contact Person: Dan Peterson | Email: danpeterson@chevron.com | Mobile: () |

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 |

| | | | |
|--|---------------------|------------------------|--|
| Facility Type: SPILL OR RELEASE | Facility ID: 489071 | API #: | County Name: WELD |
| Facility Name: DILLARD 10-44 | Latitude: 40.582529 | Longitude: -104.526344 | |
| ** 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:

- ☒ 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

| Impacted? | Impacted Media | Extent of Impact | How Determined |
|--------------|----------------|-----------------------------|---|
| UNDETERMINED | GROUNDWATER | NA | Lab Analysis and Field Screening if encountered |
| Yes | SOILS | Refer to Tables and Figures | 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 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 above ground storage tank 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 southeast of the AST. Infrastructure present at the facility upon arrival included the above ground storage tank, 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. Soil samples were analyzed by a certified laboratory, using approved ECMC laboratory analysis methods, 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; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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):

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, is attached to this Form 27. A summary of flowline decommissioning activities is being submitted under Remediation # 35728 (Dillard 10 -44 Wellhead/Flowline, API # 123-29510) on a 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) 500

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 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 remedial excavation at the flowline. A proposed soil boring map is attached to Supplemental Form 27 Document # 404039214.

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 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.

REMEDIAL ACTION 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.

Additional background sampling will be conducted to determine whether pH levels are attributed to native background concentrations. Background soil samples will be collected under the Dillard 10-44 Wellhead/Flowline (Rem # 35728) in conjunction with remedial excavation at the flowline. A proposed soil boring map is attached to Supplemental Form 27 Document # 404039214.

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.

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 Decommissioning Sample Summary & Supplemental Site Investigation 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. 06/30/2027

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. 12/20/2024

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 01/30/2025

Proposed completion of site investigation. 07/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/30/2025

Proposed date of completion of Remediation. 10/30/2026

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:

The implementation schedule has been changed due to the decommissioning of the Dillard 10-44 Facility and necessity for supplemental site investigation activities adjacent to the facility. The proposed site investigation will be completed following the approval of this form and is tentatively scheduled for August 28, 2025.

OPERATOR COMMENT

This Form 27 is being submitted to include the decommissioning results at the former Dillard 10-44 Facility and Tank Battery. This Form 27 also serves to propose a remedial excavation and a supplemental site investigation (SSI).

As per the COA on the previous Supplemental Form 27 document # 403932068, this Form 27 is strictly reporting on the Dillard 10-44 facility/tank battery under Rem # 35726 and Facility ID 302633. The implementation schedule in this form pertains only to the facility. 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 riser) 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.

Pursuant to ECMC Rule 911, a site investigation was conducted on 12/20/2024 at the Dillard 10-44 Facility and Tank Battery location. The tank battery was decommissioned in accordance with ECMC rules. Laboratory soil samples were collected from the partially-buried produced water vessel excavation base (PWV01-B@4') and N, W, S, & E sidewalls (PWV01-N@2.5' to PWV01-S@2.5') and from the above ground storage tank 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.

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 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.

A proposal to excavate the 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, and 1-methylnaphthalene exceedances observed at sample locations AST01-E@2.5', PWV01-B@4', PWV01-E@2.5' and WC01@0-6", is presented in the Remedial Action Plan section of this Form 27. 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 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 remedial excavation at the flowline. This is tentatively scheduled for August 28, 2025.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation 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: Jake Whritenour

Title: Environmental Consultant

Submit Date: 01/30/2025

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 | |

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 |
|-------------|--------------------------------|
| 404039219 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 404070759 | ANALYTICAL RESULTS |
| 404070761 | ANALYTICAL RESULTS |
| 404075612 | OTHER |
| 404076119 | SITE INVESTIGATION PLAN |

Total Attach: 5 Files

General Comments

| User Group | Comment | Comment Date |
|------------|---------|---------------------|
| | | Stamp Upon Approval |

Total: 0 comment(s)