

State of Colorado
Energy & Carbon Management Commission

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Receive Date:

Report taken by:

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>	Phone Numbers
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(832) 349-0757</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>lauren.hoff@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 31822 Initial Form 27 Document #: 403508502

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>123-34613</u>	County Name: <u>WELD</u>
Facility Name: <u>SATER CC 18-17D</u>	Latitude: <u>40.314070</u>	Longitude: <u>-104.478290</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>18</u>	Twps: <u>4N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Grassland

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Division of Water Resources (DWR) well permit 319171- is 0.16mi SW of the Location.

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.

See the Site Investigation Reports and attachments associated with Document 403971138 (In Process) for site investigation details prior to 2025.

On June 12, 2025, Confluence Compliance Companies, LCC (Confluence) oversaw drilling activities to recharacterize soil impacts identified by Eagle Environmental Consulting, LLC (Eagle) during initial site investigations. Using direct push technology, 17 soil borings were advanced at all sample locations collected by Eagle to depths ranging from 5 to 12 feet below ground surface (bgs). Eight borings were also advanced in native, nearby, non-disturbed areas at depths ranging from 5 to 10 feet bgs to characterize native concentrations of inorganics at the Location; 14 background soil samples were collected from the borings. See the attached Report of Work Completed (ROWC) 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 arsenic and sodium adsorption ratio (SAR) soil impacts identified by initial and subsequent investigation activities. Soil samples will be submitted for analysis of all Table 915-1 soil constituents of concern. See the attached ROWC for details.

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):

[Empty text box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Visual inspection at the wellhead and flowline areas occurred during decommissioning and supplemental site investigation (SSI) 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 32
Number of soil samples exceeding 915-1 6
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 600

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 14
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 12

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 June 12, 2025, 14 background soil samples were collected. The background soil samples were collected at depths between 6 and 12 feet bgs. The maximum background concentration for pH and SAR were observed to be 8.85 and 5.96, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 7.35 milligrams per kilogram (mg/kg), 179 mg/kg, and 0.474 mg/kg, respectively.

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?

SSI activities will be conducted to characterize the extent of soil impacts identified by initial and recharacterization activities. Characterization soil samples will be collected and analyzed for all Table 915-1 constituents.

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.

Noble is in the process of determining the extent of impacts associated with the project. Once impacts are delineated, Noble will prepare a remediation plan to remove the source material within the investigation area.

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.

See the Site Investigation Reports and attachments associated with Document 403971138 (In Process) for site investigation details prior to 2025.

On June 12, 2025, Confluence oversaw drilling activities to recharacterize soil impacts identified during initial site investigations. Using direct push technology, 17 soil borings were advanced at all sample locations collected by Eagle to depths ranging from 5 to 12 feet bgs. Analytical results at the wellhead indicate compliance with PGSSL except for arsenic, barium, cadmium, hexavalent chromium, and selenium. When compared to Residential Soil Screening Levels (RSSLS), only arsenic exceeded the applicable standards. SSR constituents were compliant with the applicable standards except for pH and SAR. Analytical results of flowline characterization samples indicate compliance with PGSSLs and RSSLS except for arsenic. A single SAR exceedance was also observed. Analytical results at the flowline connection at the separator indicate compliance with PGSSLs except for arsenic and barium; only arsenic exceeded allowable limits when compared to RSSLS. SSR constituents were compliant with all applicable standards except for pH. Additionally, eight borings were advanced in native, nearby, non-disturbed areas at depths ranging from 5 to 10 feet bgs to characterize native concentrations of inorganics at the Location; 14 background soil samples were collected from the borings. Analytical results of background samples indicate elevated native values of arsenic, barium, selenium, and pH exceeding PGSSLs and SSRs. See the attached ROWC 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 site investigation 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 Quarterly Update and SSIP

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 (policies MWZZ316714 and MWZX316724) 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. 11/14/2023

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. 07/27/2023

Actual Spill or Release date, or date of discovery. 02/05/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/14/2023

Proposed site investigation commencement. 09/20/2023

Proposed completion of site investigation. 12/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/22/2024

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 SATER CC #18-17D wellhead and flowline and necessity for SSI activities adjacent to the wellhead. The schedule for the proposed site investigation will be provided in the subsequent Form 27.

OPERATOR COMMENT

This form has been submitted to satisfy the quarterly reporting requirement for the SATER CC #18-17D (Remediation Project 31822), report results of recent site investigation, and provide a proposed SSI plan. Additional sampling is proposed to delineate the extent of arsenic and SAR impacts identified during the SSI completed on June 12, 2025..

Although precise groundwater depth data at the Location is unavailable, Division of Water Resources (DWR) well permits 319171- and 29878-, located approximately 0.16 miles southwest and 0.61 miles northeast of the Location, respectively, report groundwater depths of approximately 30 and 40 feet below ground surface (bgs), respectively. DWR permit 319171 sits at an elevation of approximately 4,639 feet above mean sea level (AMSL) and DWR permit 29878- sits at an elevation of approximately 4,643 feet AMSL; the Location is at approximately 4,635 feet AMSL. Based on these groundwater depths and the topographic profile of the region, depth to groundwater at the Location is estimated to be greater than 20 feet bgs. Groundwater has not been observed during site investigations related to this project. Due to the estimated depth to groundwater of more than 20 feet bgs, a direct pathway to groundwater is unlikely. For this reason, Chevron requests to compare analytical results of the investigation to RSSL.

Based on soil sampling completed by Confluence to date, all organic constituents of concern are within RSSLs. Levels of arsenic and pH elevated above allowable limits remain in the wellhead and flowline investigation areas. However, site-specific background data collected from the Location indicate that these levels are within native conditions. Statistical analysis of site-specific background samples demonstrates that the arsenic values have a lower and upper outlier (LOL and UOL) range from -2.295 to 8.145, with a 99.97% probability and no outliers were detected within the dataset. Values of pH have a LOL and UOL range from 7.430 to 9.270, with a 97.13% probability; 7.40 was identified as an outlier and omitted from the dataset. All arsenic and pH exceedances observed in recharacterization and characterization samples were within the ranges established by statistical analysis apart from an arsenic exceedance of 9.18 mg/kg observed within wellhead sample (WH01-E). Based on these results, it is reasonable to conclude that the elevated pH and arsenic values observed within the site investigation area are representative of native conditions. Chevron requests alternative allowable limits for arsenic and pH equal to the UOLs of 8.145 mg/kg and 9.27, respectively. See the attached ROWC for details.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. Confluence plans to conduct the proposed SSI by the end of the fourth quarter of 2025, in accordance with the proposed implementation schedule and the Site Investigation Plan attached to this form submittal. The results will be submitted in 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: Miranda Beard

Title: Project Scientist

Submit Date: _____

Email: miranda.beard@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: _____

Date: _____

Remediation Project Number: 31822

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

404312344	ANALYTICAL RESULTS
404316681	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)