

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



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Report taken by:  
Alexander Ahmadian

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	Phone Numbers Phone: (970) 278-6934 Mobile: ( )
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Erica Zuniga	Email: ericzuniga@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24968 Initial Form 27 Document #: 403160810

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: WELL	Facility ID: _____	API #: 123-20957	County Name: WELD
Facility Name: RIES 3-19	Latitude: 40.128061	Longitude: -104.597125	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 19	Twp: 2N	Range: 64W Meridian: 6 Sensitive Area? Yes

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**

Freshwater Pond 0.18mi E  
Farm Structures 0.15/0.18mi NW, 0.15/0.19mi SW  
Residential 0.19/0.20mi NW, 0.18mi SW

**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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the RIES 3-19 wellhead cut and cap and flowline removal. The wellhead was cut and capped per ECMC rules. Approximately 2015' of flowline was removed; approximately 265' of flowline was abandoned-in-place due to field constraints. An initial Site investigation was completed in November 2022 which included seven (7) grab soil samples collected at the wellhead excavation (1), flowline terminuses at the wellhead (1) and separator (1), flowline directional changes (2), and cut-points of flowline abandonment (2), and was reported on Supplemental Form 27 Document Number 403725902. Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, and boron. Analytical results found two soil samples exceeded the ECMC Table 915-1 values for pH and SAR. These exceedances require further action to delineate and assess pH and SAR at this Site.

On 9/10/24 Twenty-four (24) discreet interval grab samples were collected from eight hand-auger soil borings. Samples were collected at 4-, 6-, and 8-feet below ground surface (bgs) intervals to delineate around the wellhead and 1-, 3-, and 5-feet intervals to delineate around the flowline at each respective boring location. Four wellhead delineation soil borings (WH-01-N, WH-01-S, WH-01-E, and WH-01-W) within the former operations boundary of the Ries #3-19 wellhead to delineate the pH exceedance. Four delineation soil borings (FL-01-N, FL-01-S, FL-01-E, FL-01-W) were advanced around the Ries #3-19 flowline to delineate the SAR exceedance. Soil samples were analyzed by a certified laboratory for analysis of pH by United States Environmental Protection Agency (EPA) Method 9045D and analysis of SAR by EPA Method 6020B/USDA60 6(2).

## 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 ):

Operator recommends confirmation soil sampling at the wellhead at 6- ft bgs and along the flowline at 3- or 4- ft bgs as appropriate and analysis for all ECMC Table 915-1 analytes including metals. Delineation sampling at previous sample FL01-I@3' for SAR exceedance 10- ft away in ordinal directions with samples collected at 1-, 3-, and 5- ft bgs and analysis for all ECMC Table 915-1 analytes including metals. Background soil samples to be obtained sufficiently away from the impacted areas to reflect conditions not impacted by oil and gas activity, and from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples will be collected as appropriate for wellhead and flowline background and analyzed for ECMC Table 915-1 SSR parameters and metals.

### Proposed Groundwater Sampling

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

If groundwater is encountered samples will be collected and analyzed for full Table 915-1 constituents.

### 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 of the wellhead and flowline areas occurred during abandonment activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required. A detailed summary of decommissioning activities at the wellhead and flowline risers, including an ECMC Flowline Closure and Wellhead Closure Checklist, site photos, figures, and laboratory analytical results, were attached to Supplemental Form 27 # 403725902.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 31

Number of soil samples exceeding 915-1 15

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

Approximate areal extent (square feet) 1500

### NA / ND

NA Highest concentration of TPH (mg/kg) \_\_\_\_\_

-- Highest concentration of SAR 6.41

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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?

One background soil sample (Background-01 @ 3') collected at a depth of 3- ft bgs on 11/01/22 was analyzed for pH and not reported to exceed ECMC Table 915-1 Standards.

Three background soil samples (BG-01, BG-02, and BG-03) collected on 9/10/24 at a depth of 4- ft bgs were analyzed for pH. A maximum value of 8.9 was reported which exceeds ECMC Table 915-1 standards.

Three background soil samples (BG-04, BG-05, and BG-06) collected on 9/10/24 at a depth of 4- ft bgs were analyzed for SAR. A maximum value of 10.1 was reported which exceed ECMC Table 915-1 standards.

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?

Operator recommends confirmation sampling at the wellhead and along the flowline, and delineation of SAR exceedance reported along flowline. Details of the proposed supplemental site investigation are provided in this Supplemental Form 27 submission and a proposed soil sample location map is attached to this submission.

## 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 was identified 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.

NA

**Soil Remediation Summary**

In Situ

Ex Situ

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

- \_\_\_\_\_ 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 the initial decommissioning event or subsequent supplemental site investigation activity.

# 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? No

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? Yes

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. 11/01/2022

Proposed date of completion of Reclamation. 12/31/2028

## 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. 07/07/2022

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/01/2022

Proposed site investigation commencement. 09/09/2022

Proposed completion of site investigation. 11/30/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/30/2025

Proposed date of completion of Remediation. 04/01/2026

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:

In response to 7/10/25 COA on approved Supplemental Form 27 # 404182344. Discrepancies in previous reported sampling locations along flowline highlighted uncertainty of delineation of SAR exceedance along flowline. Location information has been confirmed. Schedule has been updated to accommodate supplemental site investigation activities to collect wellhead and flowline confirmation samples to be analyzed for full ECMC Table 915-1 analytes, backgrounds to be analyzed for ECMC Table 915-1 SSR and metals, and delineation of SAR exceedance along flowline.

## OPERATOR COMMENT

This 3Q25 SF27 for Ries 3-19 (REM # 24968) provides an encrypted lab report in addition to updated tables/figures for sampling conducted 18 September 2024 to reflect correct site-specific background calculations. Supplemental site investigation activities are also proposed for confirmation sampling and to delineate SAR exceedance reported along the flowline.

In response to 7/10/25 COA on approved Supplemental Form 27 # 404182344. Discrepancies in previous reported sampling locations along flowline highlighted uncertainty of delineation of SAR exceedance along flowline. Location information has been confirmed. Schedule has been updated to accommodate supplemental site investigation activities to collect wellhead and flowline confirmation samples to be analyzed for full ECMC Table 915-1 analytes, backgrounds to be analyzed for ECMC Table 915-1 SSR and metals, and delineation of SAR exceedance along flowline.

An initial Site investigation was completed in November 2022. Analytical results found two soil samples exceeded the ECMC Table 915-1 values for pH and SAR. These exceedances require further action to delineate and assess pH and SAR at this Site.

On 9/10/24 24 grab samples were collected from eight soil borings. Samples were analyzed by a certified laboratory for pH and SAR. 12 Samples around the wellhead were found to exceed ECMC standards for pH with reported values ranging from 8.4-9.6, with five samples exceeding a reported maximum background value for pH of 8.9. One sample collected around the flowline was found to exceed ECMC standards for SAR with a reported value of 6.41 but found to be below reported maximum background values for SAR of 10.1.

Operator recommends confirmation soil sampling at the wellhead at 6- ft bgs and along the flowline at 3- or 4-ft bgs as appropriate and analysis for all ECMC Table 915-1 analytes including metals. Delineation sampling at previous sample FL01-I@3' for SAR exceedance 10- ft away in ordinal directions with samples collected at 1-, 3-, and 5- ft bgs and analysis for all ECMC Table 915-1 analytes including metals. Background soil samples to be obtained sufficiently away from the impacted areas to reflect conditions not impacted by oil and gas activity, and from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples will be collected as appropriate for wellhead and flowline background and analyzed for ECMC Table 915-1 SSR parameters and metals.

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 (2409129R - Chevron RBU - Ries 3-19.pdf). The Reissued Report was received directly Summit Laboratory on 4/7/2025, which includes the application of a Digital ID/Verified Certification (lock) to support reissuance. The metadata associated with this Reissued Report 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 Report is 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.

Pursuant to Rule 913.e, quarterly reporting will be conducted until closure criteria are achieved for the remediation project. 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: Michael LeFrancois

Title: Environmental Consultant

Submit Date: 08/04/2025

Email: michael.lefrancois@erm.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: Alexander Ahmadian

Date: 08/20/2025

Remediation Project Number: 24968

## COA Type

## Description

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

404298085	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
404298218	ANALYTICAL RESULTS
404302310	SITE INVESTIGATION REPORT
404302311	SITE INVESTIGATION PLAN
404323894	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)