

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404277847
Receive Date:
07/24/2025
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: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers Phone: (970) 7307281 Mobile: ()
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38949 Initial Form 27 Document #: 404060537

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: LOCATION	Facility ID: 302630	API #: _____	County Name: WELD
Facility Name: THISTLE DOWN B 31-20D	Latitude: 40.356150	Longitude: -104.592710	
** correct Lat/Long if needed: Latitude: 40.356138		Longitude: -104.593514	
QtrQtr: SENW	Sec: 31	Twp: 5N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Cropland
Is domestic water well within 1/4 mile? No 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

Riverine 0.22mi NE
Apparent Pond 0.13mi SE

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 THISTLE DOWN T5N-R64W-S31 L01 Facility and Tank Battery location on 04/08/2025 and 04/09/2025.

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):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s) (AST01@0-6" - AST07@0-6"), at the risers for the flowline(s) (SEP01-FL@4') and dumpline(s) (SEP01-DL@4' - SEP07-DL@4') of any separator(s). In addition, the on-site dump lines located between the separator and tank battery was removed by pulling from either end. 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, and 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 sample 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 all disturbed areas using visual and olfactory senses. Additionally, discrete soil samples were collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. A detailed summary of tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 29

Number of soil samples exceeding 915-1 20

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

Approximate areal extent (square feet) 2000

NA / ND

ND Highest concentration of TPH (mg/kg) _____

_____ Highest concentration of SAR _____

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?

On 04/09/2025, three background soil samples were collected from one discrete location (BKG01) adjacent to the tank battery and analyzed for metals in soil per ECOM Table 915-1, pH, SAR, EC, and boron. Background samples were collected from depths ranging between 0.5 to 4 feet below ground surface (ft bgs). The maximum background concentrations for pH and EC were observed to be 7.61 and 0.346, respectively. The maximum background concentration with a 1.25x multiplier applied for arsenic was calculated to be 2.08mg/kg.

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?

Based on the analytical results collected during decommissioning, a supplemental site investigation (SSI) will be completed to recollect soil sample locations AST01 @0-6", AST02@0-6", AST03@0-6", AST04@0-6", AST05@0-6", AST06@0-6", PWV01-B@4', PWV01-N@2.5', PWV02-B@4', PWV02-W@2.5', PWV03-B@4', PWV03-S@2.5', PWV04-B@4', PWV04-N@2.5', PWV05-B@4', PWV05-S@2.5', PWV06-B@4', PWV06-N@2.5', PWV07-B@4', and PWV07-N@2.5' for full table 915-1 constituents. A proposed SSI map is attached to this Form 27. Concurrently with the SSI, additional background samples will be collected to determine if pH, EC, and arsenic concentrations are attributed to native soil conditions at the site. 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.

No impacted material caused by oil and gas operations was identified at this time.

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.

A SSI will be completed to recollect soil sample locations AST01@0-6", AST02@0-6", AST03@0-6", AST04@0-6", AST05@0-6", AST06@0-6", PWV01-B@4', PWV01-N@2.5', PWV02-B@4', PWV02-W@2.5', PWV03-B@4', PWV03-S@2.5', PWV04-B@4', PWV04-N@2.5', PWV05-B@4', PWV05-S@2.5', PWV06-B@4', PWV06-N@2.5', PWV07-B@4', and PWV07-N@2.5' for full table 915-1 constituents. The SSI will be completed in accordance with the attached proposed site investigation map and proposed sampling plan outlined in the Site Investigation Report section of this Form 27.

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 initial 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 and 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 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? _____

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 reseeded 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. 04/08/2025

Proposed date of completion of Reclamation. 01/14/2027

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. 12/31/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/08/2025

Proposed site investigation commencement. 07/14/2025

Proposed completion of site investigation. 01/14/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/14/2026

Proposed date of completion of Remediation. 07/14/2026

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 Thistle Down B31-20D tank battery and necessity for supplemental site investigation activities adjacent to the tank battery. The proposed site investigation will be completed following the approval of this form and is tentatively scheduled for commencement on 01/14/2026.

OPERATOR COMMENT

This Form 27 is being submitted to include the decommissioning results at the former Thistle Down B31-20D tank battery location and propose supplemental investigation.

Operator was informed by the laboratory that the sample holding times were exceeded for various Table 915-1 constituents. Because not all analytes would be outside of holding time, the lab ran the samples for the full table 915-1 suite. The full laboratory report (Report) is being transmitted to ECMC for full transparency. The Report's case narrative identifies which constituents were run outside of the required holding times. The Report's note column also identifies the impacted constituents. Operator will not be relying on any results associated with a constituent that was outside of the required holding time. Operator will be collecting replacement samples and will be submitting them for analysis. Operator will submit the replacement sample laboratory report in a future supplemental Form 27. The 8260B GBTEXN were analyzed outside of allotted hold times due to delays at Summit Scientific for the soil samples collected during flowline decommissioning on 04/08/2025

Tank battery decommissioning activities occurred at the above referenced location on April 8, 2025 and April 9, 2025. Discrete soil samples were collected from beneath the former facility infrastructure as described in the approved Form 27-Initial (Document Number 404060537). Groundwater was not encountered during initial decommissioning activities.

On 04/09/2025, three background soil samples were collected from one discrete location (BKG01) adjacent to the tank battery and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background samples were collected from depths ranging between 0.5 to 4 feet below ground surface (ft bgs). The maximum background concentrations for pH and EC were observed to be 7.61 and 0.346, respectively. The maximum background concentration with a 1.25x multiplier applied for arsenic was calculated to be 2.08mg/kg.

Based on the analytical results collected during decommissioning, a supplemental site investigation (SSI) will be completed to recollect soil sample locations AST01@0-6", AST02@0-6", AST03@0-6", AST04@0-6", AST05@0-6", AST06@0-6", PWV01-B@4', PWV01-N@2.5', PWV02-B@4', PWV02-W@2.5', PWV03-B@4', PWV03-S@2.5', PWV04-B@4', PWV04-N@2.5', PWV05-B@4', PWV05-S@2.5', PWV06-B@4', PWV06-N@2.5', PWV07-B@4', and PWV07-N@2.5' for full table 915-1 constituents. A proposed SSI map is attached to this Form 27. During the SSI, soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the SSI, additional background samples will be collected to determine if pH, EC, and arsenic concentrations are attributed to native soil conditions at the site. The SSI will be completed in accordance with the attached proposed site investigation map, and proposed sampling plan outlined in the Site Investigation Report section of this Form 27.

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: Collin Barker

Title: Environmental Consultant

Submit Date: 07/24/2025

Email: cbarker@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: _____

Date: _____

Remediation Project Number: 38949

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
404277847	FORM 27-SUPPLEMENTAL-SUBMITTED
404278204	ANALYTICAL RESULTS
404278206	ANALYTICAL RESULTS
404289194	SITE INVESTIGATION REPORT
404289195	SITE INVESTIGATION PLAN

Total Attach: 5 Files

General Comments

User Group	Comment	Comment Date
Environmental	Attached documents indicate that laboratory reporting was run outside of recommended holding times. ECMC has denied this Form 27 without technical review. Operator is directed to submit a replacement Form 27 as soon as possible with a plan for resampling.	08/26/2025

Total: 1 comment(s)

Date Run: 8/26/2025 Doc [#404277847]

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