

September 16, 2025

NOBLE ENERGY, INC. (Operator: 100322)  
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## Report of Work Completed – Facility Closure Investigation

|                                 |                           |
|---------------------------------|---------------------------|
| <b>ECMC Location Name (ID)</b>  | DERR 21-4 (414532)        |
| <b>ECMC Well Name (API)</b>     | DERR #21-4 (05-123-30775) |
| <b>Client Location Name</b>     | Derr 21-04                |
| <b>ECMC Remediation Project</b> | 29994                     |
| <b>Legal Description</b>        | SENE Sec. 4 T5N-R65W      |
| <b>Coordinates (Lat, Long)</b>  | 40.431342, -104.663468    |
| <b>County</b>                   | Weld County, Colorado     |

### Introduction

Confluence Compliance Companies, LLC (Confluence) prepared this Report of Work Completed (ROWC) for Chevron U.S.A Inc. (Chevron) to document remedial investigation activities associated with wellhead cut and cap and flowline removal at the DERR #21-4 (API: 05-123-30775) (Location). Sampling completed by Confluence indicates that all organic constituents of concern are within Table 915-1 Protection of Groundwater Soil Screening Levels (PGSSLs). However, based on the proximity of recharacterization points to live utilities around the wellhead, the previous effort to advance soil borings could not safely be completed. A supplemental site visit where potholing of proposed boring sites and daylighting of adjacent utilities will be necessary to complete this work safely and in accordance with Confluence and Chevron ground disturbance policies. Additionally, continued background sampling is needed to further characterize native inorganic levels at the Location.

The Location is approximately 1.5 miles east of Greeley, Colorado, in Weld County as illustrated in the attached Topographic Location Map. Additional site details are included in the title block, Site Diagrams, and laboratory summary tables appended to this document. This ROWC provides background on the Location, methods used to complete the investigation, results of the investigation, and recommendations for how to proceed with this information.

### Project Background

On September 6, 2023, initial characterization sampling was completed by a previous consultant at the wellhead following cut and cap operations. Soil samples were collected for field-screening from all four sidewalls and the base of the wellhead excavation and at surface locations in each cardinal direction. The excavation samples were submitted for laboratory analysis of all ECMC Table 915-1 constituents of concern, with the exception of metals. Analytical results indicated compliance with PGSSLs and Soil Suitability for Reclamation (SSR) standards for all analyzed constituents except for pH in three samples. One background sample was collected and submitted for pH, however, due to the proximity to the wellhead, the sample will not be considered

as a representative background sample. See the attachments associated with ECMC Form 27 Document 404137149 for details.

On November 10, 2023, initial flowline characterization sampling was completed by a previous consultant during the removal of approximately 1,264 feet of flowline. Soil samples were collected along the flowline at points of material change and/or hammer unions and directional changes. Seven samples were collected for field-screening and five were submitted for analysis of all Table 915-1 constituents. Analytical results indicated compliance with the applicable standards for all organic constituents. Exceedances of PGSSLs and SSR standards were detected for arsenic, barium, selenium, and pH. Two background samples were collected and submitted for analysis of all Table 915-1 inorganics (SSR and metal constituents). Only one sample was collected from an area outside of historical oil and gas development; analytical results for that sample indicated elevated pH and arsenic levels. See the attachments associated with Form 27 Document 404123076 for details; the form remains "In Process" at the time of this report.

## Scope of Work

On August 7, 2025, Confluence provided sampling support to recharacterize wellhead and flowline samples collected during initial site investigations. Using an environmental drill rig equipped with solid stem auger, soil borings were planned to be advanced at the locations of each previously collected sample. However, no soil borings could be advanced around the wellhead investigation area due to the proximity of private utilities. Collected flowline soil samples were field-screened for evidence of impacts using visual and olfactory indicators, as well as a photoionization detector (PID), to assess potential hydrocarbon impacts. Two background soil samples were also collected in native, nearby, non-disturbed areas to characterize native concentrations of inorganics at the Location. Detailed procedures, methods, and activity notes are available upon request.

All samples were collected in laboratory-provided containers, immediately placed on ice, and delivered to the lab under completed chain-of-custody (COC) forms. The recharacterization samples were analyzed for all Table 915-1 soil constituents and background samples were analyzed for Table 915-1 inorganics.

## Results

These results summarize observations from onsite investigation efforts and associated laboratory analytical results. For organizational and presentation purposes, the results summary is divided between general observations of lithology and hydrogeology for the entire Location and site investigation activities. Collected spatial data are depicted in the attached Site Diagrams and analytical results are summarized in the attached tables.

### Lithology and Hydrogeology

The lithology at the Location is comprised of sandy soils and the classification is characterized by the Natural Resources Conservation Service (NRCS) as Ustic Torriorthents and Aquolls and Aquents gravely substratum.



Although precise groundwater depth data at the Location has not been measured in association with facility decommissioning efforts, a network of 15 monitoring wells has been installed in the immediate vicinity of the Location. The wells are associated with the mining activities at the site. Division of Water Resources (DWR) well permits 311488-, 311493-, 311489-, 311492-, and 311490- represent the wells closest to the Location, located less than 200 feet south. The recorded depths to water range from 9 to 17 feet below ground surface (bgs) with the wells sitting at approximately 4,630 to 4,638 feet above mean sea level (AMSL). The Location sits at approximately 4,647 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.

### **Flowline Recharacterization Results**

Due to conflicts with private utilities, only SEP01-FL, SEP02-FL, and FL01-04 sample locations could be collected. Field-screening did not indicate the presence of hydrocarbon impacts. Analytical results of the flowline recharacterization samples indicate compliance with PGSSLs and except for arsenic, barium, lead and selenium. When compared to Table 915-1 Residential Soil Screening Levels (RSSLs), only arsenic exceeded allowable limits. SSR constituents were compliant with all applicable standards.

### **Background Results**

Analytical results of background samples indicate elevated native values of arsenic, barium, and selenium exceeding PGSSLs, with maximum values of 33.2 milligrams per kilogram (mg/kg), 134 mg/kg, and 0.653 mg/kg, respectively. A native pH value of 8.77 was also observed above the SSR standard.

### **Recommendations and Analysis**

Based on soil sampling completed by Confluence, all organic constituents of concern are within PGSSLs. Confluence plans to use a hydro vacuum truck to clear the remaining sample locations around the wellhead and complete recharacterization efforts. Inconsistent spatial data quality is apparent when flowline samples illustrated in past site diagrams provided by previous consultants are compared to the former wellhead location. The wellhead location has been independently verified through multiple corroborating sources. The flowline data was provided as coordinate data from another consultant and cannot be verified.

Elevated values of metals and pH remain at the wellhead site investigation area. However, values of these constituents exceeding allowable limits were detected in background samples at comparable concentrations. When compared to the current dataset of background values, there is no clear evidence that these inorganic values are related to oil and gas operations at the Location. Confluence recommends collecting additional background samples from nearby, undisturbed areas for a more diverse background dataset to further characterize native soil conditions present at the Location. If additional background sampling efforts prove unfounded, additional delineation will be conducted.

The current land use of the Location is gravel mining. Based on the depth to groundwater, the current land use, and assuming that no organic impacts are discovered following the completed site investigation, Confluence recommends that Chevron request closure under the RSSL cleanup standard.



## Closing

The data and analyses presented in this ROWC were completed in accordance with Confluence's Standard Operating Procedures (SOPs) and the approved scope of work for the DERR #21-4 (Remediation Project 29994). Analytical results were evaluated against the applicable screening levels in ECMC Table 915-1. Field activities were conducted by trained personnel under a site-specific Health and Safety Plan (HASP) and SOPs for instrument calibration, equipment decontamination, sample collection, and COC. Samples were preserved and delivered under COC to an accredited laboratory, and quality assurance and quality control (QA/QC) review confirms that data quality objectives were met. Project execution followed Confluence's standard management structure for scope control, scheduling, and technical review. To the best of our knowledge, the information presented is accurate for the Location and the dates of work.

Confluence is grateful for the opportunity to support you with this project. If you have any questions about the methods, results or recommendations presented here, please do not hesitate to contact us.

Regards,

*Miranda Beard*

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## Attachments

- Topographic Location Map
- Site Diagram – Project Overview
- Table 1 – Field Data Summary Table
- Table 2 – Summary of Volatile Organic Soil Chemistry Data
- Table 3 – Summary of Polycyclic Aromatic Hydrocarbon Soil Chemistry Data
- Table 4 – Summary of Soil Suitability for Reclamation
- Table 5 – Summary of Metals in Soil Chemistry Data
- Photographic Log





## Topographic Location Map

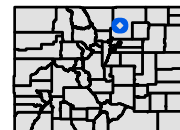
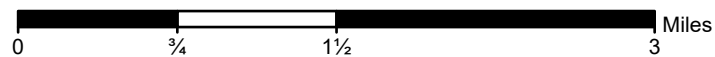
operator name (#): NOBLE ENERGY, INC. (100322)

name (API/ID): DERR #21-04 (05-123-30775)

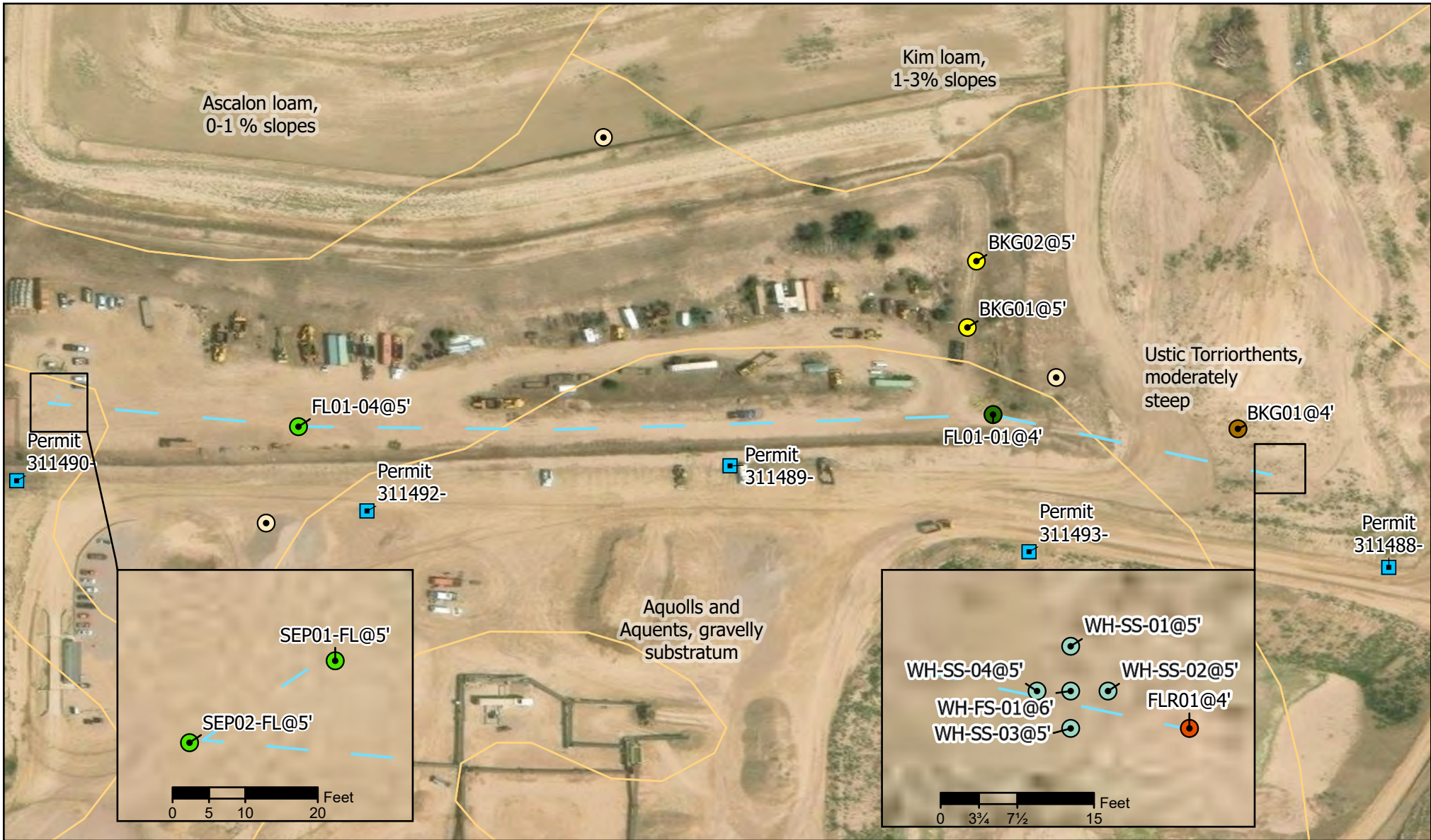
legal description: SENE Sec. 4 T5N-R65W

city, county: Unincorporated, Weld County

lat, long: 40.431342 , -104.663468



Topographic data presented in this map were sourced from publicly available datasets and other referenced sources. While care has been taken to ensure accuracy, discrepancies may occur due to variations in data resolution, projection, and field conditions. Map features and boundaries are approximate and provided for planning and illustrative purposes only. Data may have been manually adjusted to better align with desired representation and to reflect site-specific conditions. This map should not be relied upon for legal, engineering, or surveying purposes.



## Site Diagram - Project Overview

operator name (#): NOBLE ENERGY, INC. (100322)

name (API/ID): DERR #21-04 (05-123-30775)

legal description: SENE Sec. 4 T5N-R65W

city, county: Unincorporated, Weld County

lat, long: 40.431342 , -104.663468

DWR Wells

Soil Sample Collected by Previous Consultant (11/10/2023)\*\*\*

Soil Sample Collected by Previous Consultant (9/6/2023)  
Locations to be Recharacterized

Soil Sample: Collected by Previous Consultant (11/10/2023)  
Recharacterized by Confluence (8/7/2025)

Soil Sample: Collected by Previous Consultant (11/10/2023)  
Locations to be Recharacterized

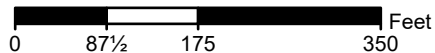
Background Soil Sample: Collected by Previous Consultant (11/10/2023)

Background Soil Sample: Collected by Confluence (8/7/2025)

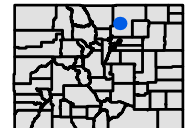
Proposed Background Soil Sample

Approximate Flowline (Removed)

NRSC Soil Survey: Map Unit Boundary



\*\*\*Inconsistent spatial data quality is apparent when the illustrated flowline sample collection point is compared to the former wellhead location. The wellhead location has been independently verified through multiple corroborating sources. The flowline data was provided as coordinate data from another contractor and cannot be verified.



Spatial data and aerial imagery provided by third party sources. This information is used for reference purposes only. Confluence does not guarantee the accuracy of this material and is not responsible for any misuse or misinterpretation of this information.

**TABLE 1**  
**FIELD DATA SUMMARY TABLE**  
**NOBLE 100322**  
**DERR 21-4, WELD COUNTY, COLORADO**  
**REM # 29994**

| Sample ID   | Sample Date | Depth (ft) | GPS Data           |              | PDOP Value | VOC Concentration (ppm) |
|-------------|-------------|------------|--------------------|--------------|------------|-------------------------|
|             |             |            | Latitude/Longitude |              |            |                         |
| SEP02-FL@5' | 8/7/2025    | 5          | 40.431593          | -104.667982  | 0.865016   | 0.0                     |
| SEP01-FL@5' | 8/7/2025    | 5          | 40.431624          | -104.667927  | 1.051058   | 0.6                     |
| FLO1-04@5'  | 8/7/2025    | 5          | 40.431507          | -104.667054  | 0.967989   | 0.1                     |
| BKG01@4'    | 11/10/2023  | 4          | 40.4314992         | -104.6635756 | -          | 0.0                     |
| BKG01@5'    | 8/7/2025    | 5          | 40.431875          | -104.664577  | 0.966879   | 3.1                     |
| BKG02@5'    | 8/7/2025    | 5          | 40.432120          | -104.664544  | 0.929346   | 0.3                     |

1. Global Positioning System (GPS) data is provided in decimal degrees using North American Datum (NAD) 83 UTMZone 13 North.

2. Volatile organic compound (VOC) concentrations are measured in the field using a photoionization detector (PID).

PDOP = Position Dilution of Precision

ppm = Parts per million

ft = Feet

TABLE 2  
SUMMARY OF VOLATILE ORGANIC SOIL CHEMISTRY DATA  
NOBLE 100322  
DERR #21-4, WELD COUNTY, COLORADO  
REM # 29994

| Sample ID   | Sample Date | Depth (ft) | Benzene<br>(mg/kg) | Toluene<br>(mg/kg) | Ethyl-Benzene<br>(mg/kg) | Xylenes<br>(mg/kg) | 1,2,4-<br>Trimethyl-<br>Benzene<br>(mg/kg) | 1,3,5-<br>Trimethyl-<br>Benzene<br>(mg/kg) | Naphthalene<br>(mg/kg) | TPH<br>(mg/kg) | TPH GRO<br>(mg/kg) | TPH DRO<br>(mg/kg) | TPH ORO<br>(mg/kg) |
|---|-------------|------------|--------------------|--------------------|--------------------------|--------------------|--|--|------------------------|----------------|--------------------|--------------------|--------------------|
| ECMC Table 915-1 Limits (Residential SSL)               |             |            | 1.2                | 490                | 5.8                      | 58                 | 30   | 27   | 2                      | 500            | 500**              |                    |                    |
| ECMC Table 915-1 Limits (Protection of Groundwater SSL) |             |            | 0.0026             | 0.69               | 0.78                     | 9.9                | 0.0081                                     | 0.0087                                     | 0.0038                 | 500            | 500**              |                    |                    |
| SEP02-FL@5'   | 8/7/2025    | 5          | <0.002             | <0.002             | <0.002                   | <0.002             | <0.002                                     | <0.002                                     | <0.004                 | <500           | <0.200             | <25.0              | <100               |
| SEP01-FL@5'   | 8/7/2025    | 5          | <0.002             | <0.002             | <0.002                   | <0.002             | <0.002                                     | <0.002                                     | <0.004                 | <500           | <0.200             | <25.0              | <100               |
| FL01-04@5'  | 8/7/2025    | 5          | <0.002             | <0.002             | <0.002                   | <0.002             | <0.002                                     | <0.002                                     | <0.004                 | <500           | <0.200             | <25.0              | <100               |

1. Bold values exceed the ECMC Table 915-1 limit(s)
  2. Red & blue highlighted soil analytical values indicate an exceedance of the referenced soil screening level (SSL)
  3. \* Indicates laboratory minimum detection limit in excess of SSL
  4. \*\* Summation of GRO+DRO+ORO must be less than 500 mg/kg
- (<) = Analytical result is less than the indicated laboratory reporting limit.  
TPH-GRO = Total petroleum hydrocarbons - gasoline range organics  
TPH-DRO = Total petroleum hydrocarbons - diesel range organics  
TPH-ORO = Total petroleum hydrocarbons - oil range organics  
mg/kg = Milligrams per kilogram  
ft. = Feet  
NA - Not analyzed

TABLE 3  
SUMMARY OF POLYCYCLIC AROMATIC HYDROCARBON SOIL CHEMISTRY DATA  
NOBLE 100322  
DERR #21-4, WELD COUNTY, COLORADO  
REM # 29994

| Sample ID   | Sample Date | Depth (ft) | Acenaphthene (mg/kg) | Anthracene (mg/kg) | Benzo (a) Anthracene (mg/kg) | Benzo (a) Pyrene (mg/kg) | Benzo (b) Fluoranthene (mg/kg) | Benzo (k) Fluoranthene (mg/kg) | Chrysene (mg/kg) | Dibenzo (a,h) Anthracene (mg/kg) | Fluoranthene (mg/kg) | Fluorene (mg/kg) | Indeno (1,2,3-cd) Pyrene (mg/kg) | Pyrene (mg/kg) | 1-Methyl - Naphthalene (mg/kg) | 2-Methyl - Naphthalene (mg/kg) |
|---|-------------|------------|----------------------|--------------------|------------------------------|--------------------------|--------------------------------|--------------------------------|------------------|----------------------------------|----------------------|------------------|----------------------------------|----------------|--------------------------------|--------------------------------|
| ECMC Table 915-1 Limits (Residential SSL)               |             |            | 360                  | 1800               | 1.1                          | 0.11                     | 1.1                            | 11                             | 110              | 0.11                             | 240                  | 240              | 1.1                              | 180            | 18                             | 24                             |
| ECMC Table 915-1 Limits (Protection of Groundwater SSL) |             |            | 0.55                 | 5.8                | 0.011                        | 0.24                     | 0.3                            | 2.9                            | 9                | 0.096                            | 8.9                  | 0.54             | 0.98                             | 1.3            | 0.006                          | 0.019                          |
| SEP02-FL@5'   | 8/7/2025    | 5          | <0.020               | <0.020             | 0.005                        | <0.020                   | <0.020                         | <0.020                         | <0.020           | <0.020                           | <0.020               | <0.020           | <0.020                           | <0.020         | <0.002                         | <0.002                         |
| SEP01-FL@5'   | 8/7/2025    | 5          | <0.020               | <0.020             | <0.005                       | <0.020                   | <0.020                         | <0.020                         | <0.020           | <0.020                           | <0.020               | <0.020           | <0.020                           | <0.020         | <0.002                         | <0.002                         |
| FL01-04@5'  | 8/7/2025    | 5          | <0.020               | <0.020             | <0.005                       | <0.020                   | <0.020                         | <0.020                         | <0.020           | <0.020                           | <0.020               | <0.020           | <0.020                           | <0.020         | <0.002                         | <0.002                         |

1. Bold values exceed the ECMC Table 915-1 limit(s)
  2. Red & blue highlighted soil analytical values indicate an exceedance of the referenced soil screening level (SSL)
  3. \* Indicates laboratory minimum detection limit in excess of SSL
- (<) = Analytical result is less than the indicated laboratory reporting limit.  
mg/kg = Milligrams per kilogram  
ft = Feet  
NA - Not analyzed

**TABLE 4**  
**SUMMARY OF SOIL SUITABILITY FOR RECLAMATION**  
**NOBLE 100322**  
**DERR #21-4, WELD COUNTY, COLORADO**  
**REM # 29994**

| Sample ID                                | Sample Date | Depth (ft) | pH<br>(Standard<br>Units) | EC<br>(mmhos/cm) | SAR<br>(Standard<br>Units) | Boron<br>(mg/L) |
|--|-------------|------------|---------------------------|------------------|----------------------------|-----------------|
| ECMC Table 915-1 Soil Suitability Limits |             |            | 6 - 8.3                   | <4               | <6                         | 2               |
| SEP02-FL@5'                              | 8/7/2025    | 5          | 8.14                      | 0.406            | 0.0894                     | 0.847           |
| SEP01-FL@5'                              | 8/7/2025    | 5          | 8.18                      | 0.480            | 0.216                      | 0.715           |
| FL01-04@5'                               | 8/7/2025    | 5          | 8.08                      | 2.94             | 5.89                       | 0.542           |
| BKG01@4'                                 | 11/10/2023  | 4          | <b>8.77</b>               | 1.24             | 1.14                       | <b>&lt;2.00</b> |
| BKG01@5'                                 | 8/7/2025    | 5          | 8.14                      | 1.15             | 1.59                       | 0.498           |
| BKG02@5'                                 | 8/7/2025    | 5          | 8.27                      | 0.643            | 1.34                       | 0.195           |
| Maximum Background Concentration         |             |            | 8.77                      | 1.24             | 1.14                       | 0.498           |

1. **Bold** faced values exceed the ECMC Table 915-1 limit(s), but are within background concentrations.
2. **Bold** faced values exceed the ECMC Table 915-1 limit(s) and native background concentrations.
3. Brown highlighted soil analytical values indicate a regulatory exceedance.

NA - Not analyzed

TABLE 5  
SUMMARY OF METALS IN SOIL CHEMISTRY DATA  
NOBLE 100322  
DERR #21-4, WELD COUNTY, COLORADO  
REM # 29994

| Sample ID   | Sample Date | Depth (ft) | Arsenic (mg/kg) | Barium (mg/kg) | Cadmium (mg/kg) | Chromium (VI) (mg/kg) | Copper (mg/kg) | Lead (mg/kg) | Nickel (mg/kg) | Selenium (mg/kg) | Silver (mg/kg) | Zinc (mg/kg) |
|---|-------------|------------|-----------------|----------------|-----------------|-----------------------|----------------|--------------|----------------|------------------|----------------|--------------|
| ECMC Table 915-1 Limits (Residential SSL)               |             |            | 0.68            | 15000          | 71              | 0.3                   | 3100           | 400          | 1500           | 390              | 390            | 23000        |
| ECMC Table 915-1 Limits (Protection of Groundwater SSL) |             |            | 0.29            | 82             | 0.38            | 0.00067               | 46             | 14           | 26             | 0.26             | 0.8            | 370          |
| SEP02-FL@5'   | 8/7/2025    | 5          | <b>5.56</b>     | <b>120</b>     | <0.375          | <0.116                | <45.4          | <b>14.5</b>  | <25.6          | <b>0.395</b>     | <0.789         | <365         |
| SEP01-FL@5'   | 8/7/2025    | 5          | <b>5.46</b>     | <b>124</b>     | <0.352          | <0.119                | <42.6          | <13.0        | <24.1          | <b>0.416</b>     | <0.742         | <343         |
| FL01-04@5'  | 8/7/2025    | 5          | <b>5.18</b>     | <b>145</b>     | <0.345          | <0.127                | <41.8          | <12.7        | <23.6          | <b>0.661</b>     | <0.726         | <336         |
| BKG01@4'  | 11/10/2023  | 4          | 1.81            | 61.1           | <0.200          | <0.30                 | 2.45           | 4.72         | 2.44           | <0.260           | 0.0269         | 8.27         |
| BKG01@5'  | 8/7/2025    | 5          | 5.67            | 107            | <0.366          | <0.144                | <44.3          | <13.5        | <25.0          | 0.267            | <0.771         | <356         |
| BKG02@5'  | 8/7/2025    | 5          | <b>33.2</b>     | 134            | <0.357          | <0.104                | <43.2          | <13.2        | <24.4          | 0.653            | <0.752         | <348         |
| 1.25x Maximum Background Concentration                  |             |            | 41.5            | 168            | -               | -                     | 3.06           | 5.90         | 3.05           | 0.816            | 0.0336         | 10.34        |

- Bold** faced values exceed the ECMC Table 915-1 limit(s), but are within 1.25x background concentrations.
- Red** faced values exceed the ECMC Table 915-1 limit(s) and native background concentrations.
- Red & blue highlighted soil analytical values indicate an exceedance of the referenced soil screening level (SSL).
- Non-detect background results accounted for in the highest background concentration by using the reporting limit.

ECMC = Energy & Carbon Management Commission

(<) = Analytical result is less than the indicated laboratory reporting limit.

mg/kg = Milligrams per kilogram

ft = Feet

\* Indicates laboratory minimum detection limit in excess of SSL

NA - Not analyzed



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)



FL01-01 Sample Location Marked in White with Locator Markings in Red (Not Drilled): View Northwest



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)



WH01-N: Sample Location Marked in White with Locator Markings in Red (Not Drilled): View Southeast



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)



WH01: Sample Location Marked in White with Locator Markings in Red (Not Drilled): View West



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)

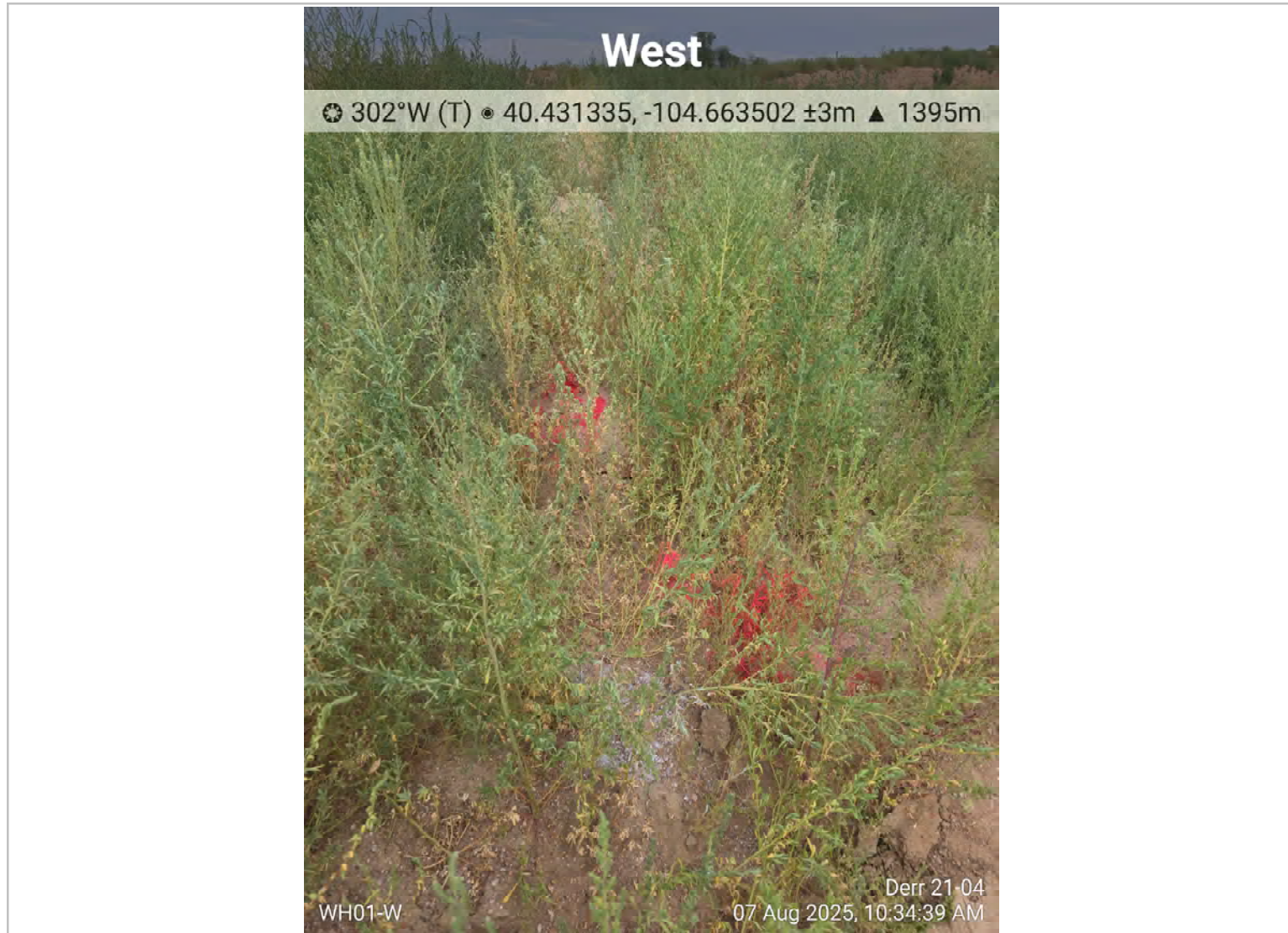


WH01-S: Sample Location Marked in White with Locator Markings in Red (Not Drilled): View Southwest



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)

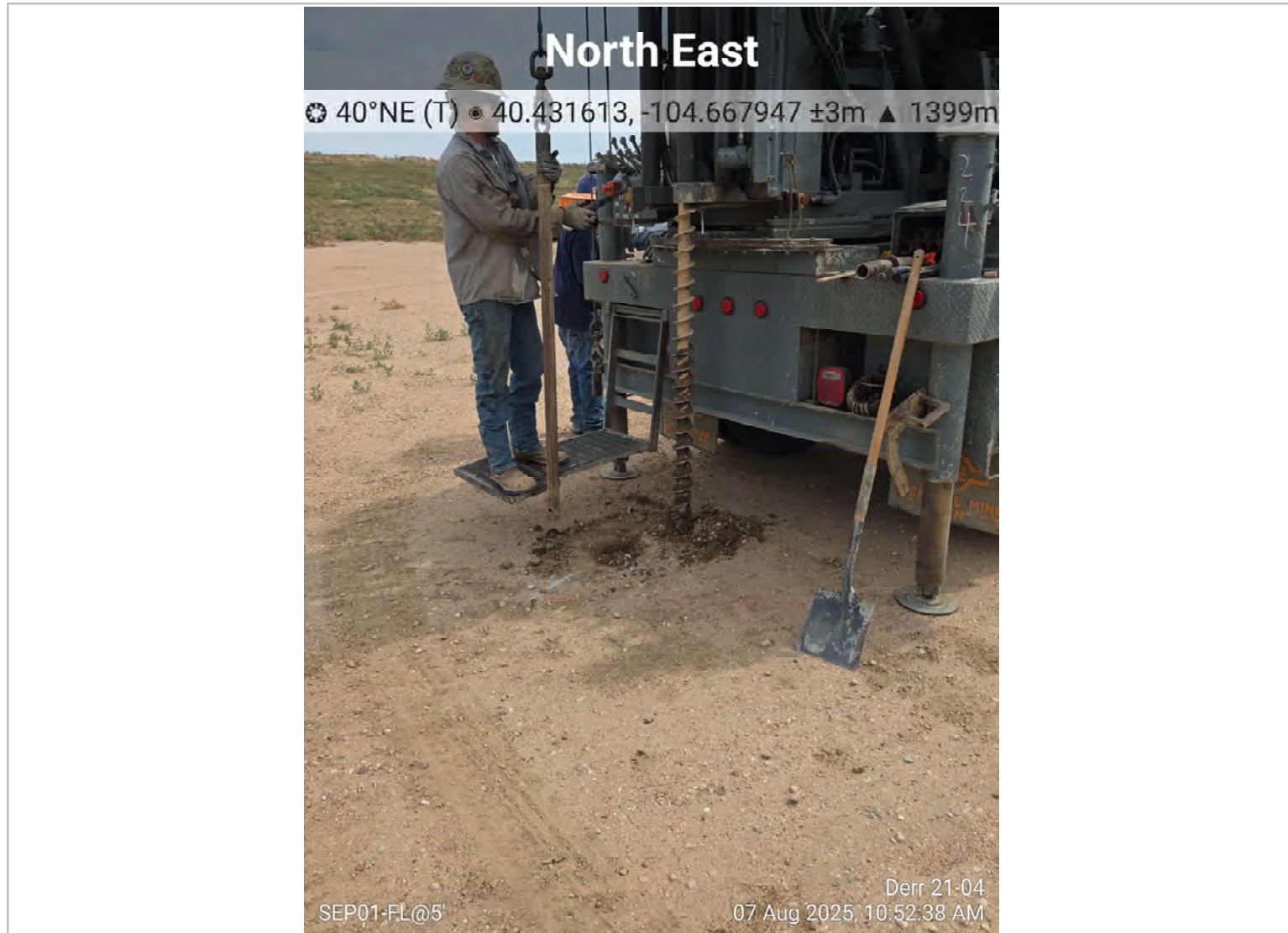


WH01-W: Sample Location Marked in White with Locator Markings in Red (Not Drilled): View West



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)

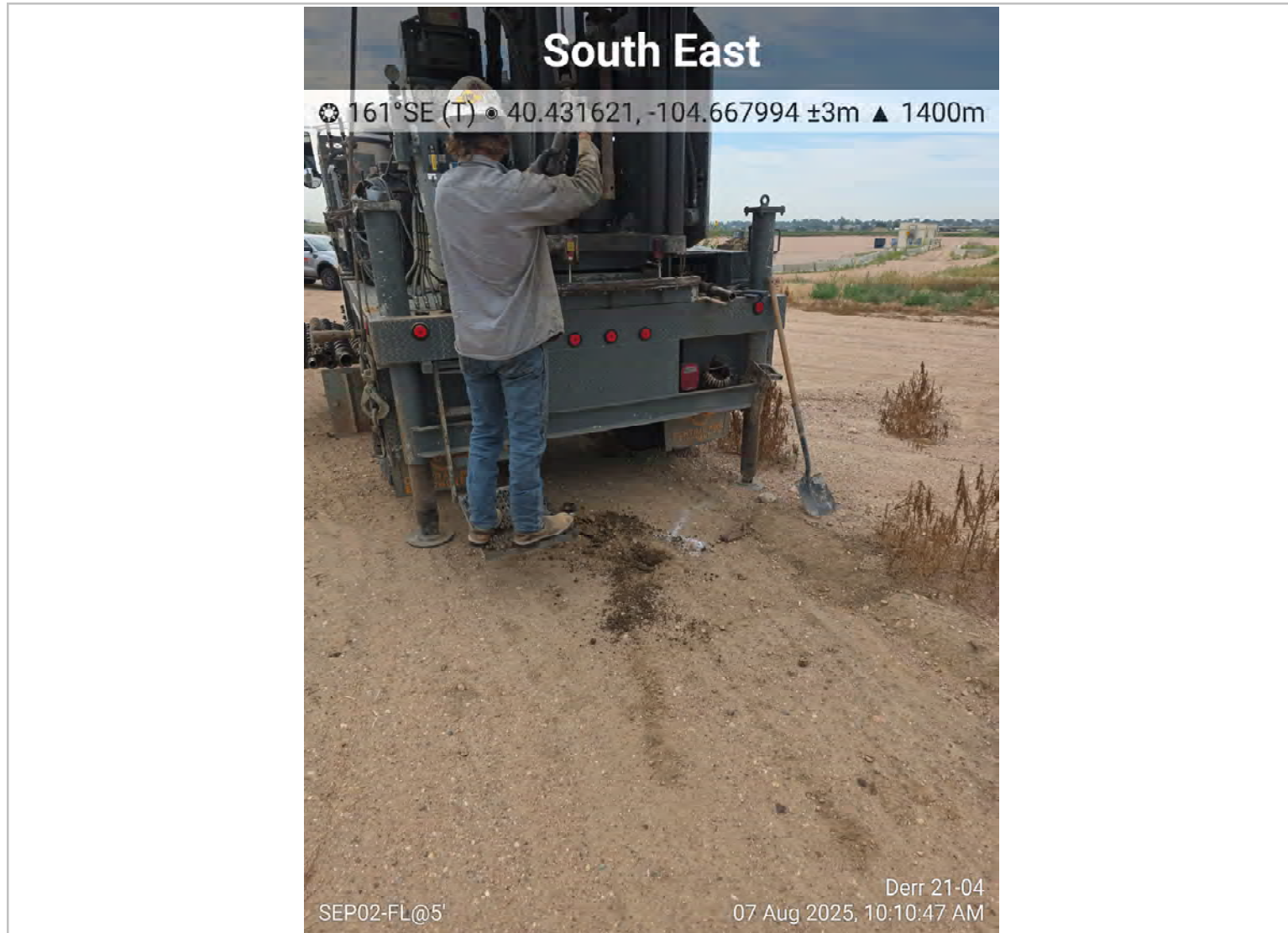


SEP01-FL Sample Location: View Northeast



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)



SEP02-FL Sample Location: View Southeast



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)

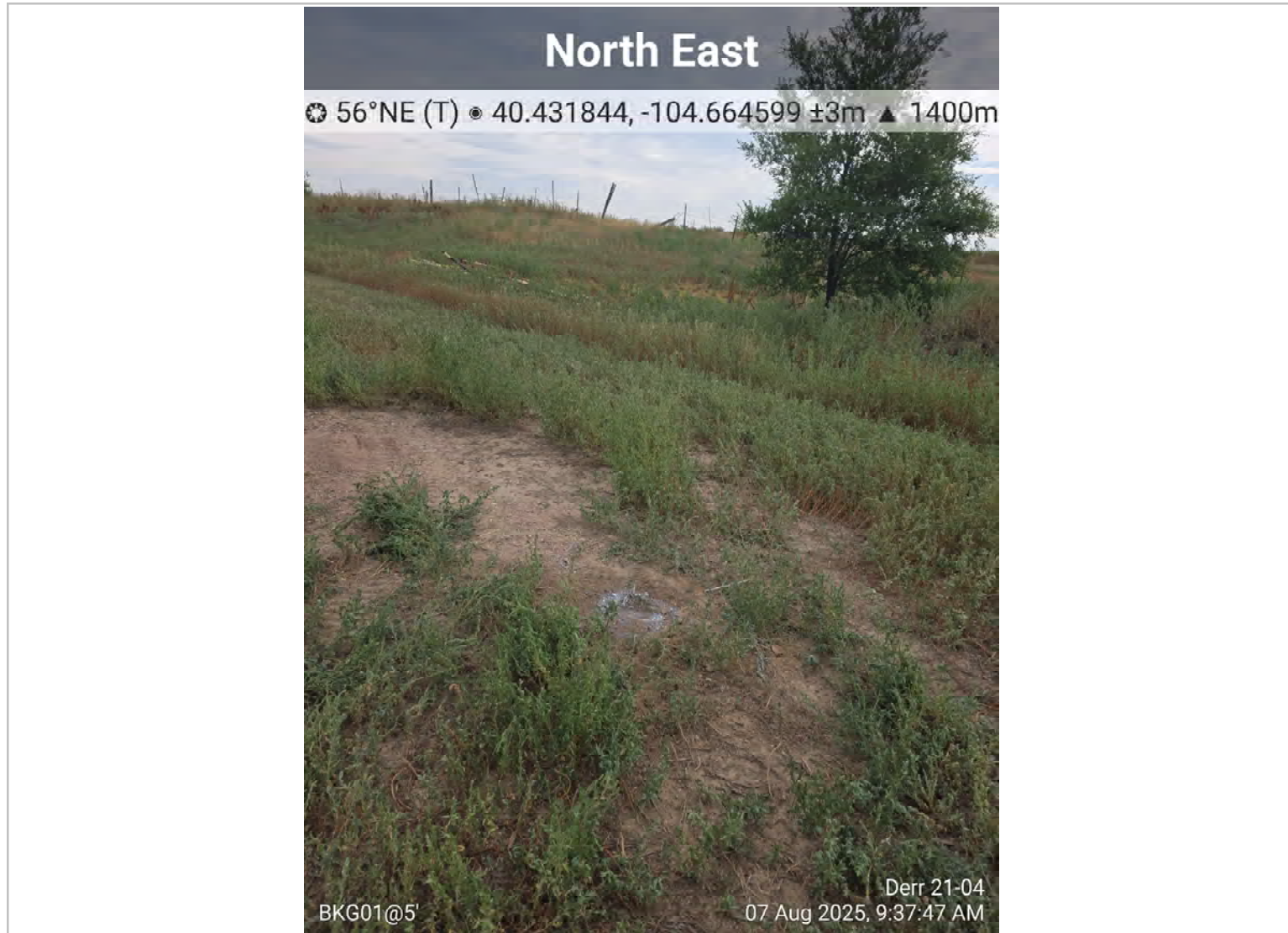


FL01-04 Sample Location: View East



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)



BKG01 Sample Location (Post-Drilling): View Southeast



## Photographic Log

Facility Closure Investigation  
DERR #21-4 (API: 05-123-30775)



BKG02 Sample Location: View Southeast