

State of Colorado
Energy & Carbon Management Commission

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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 ECOM is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	Phone: <u>(970) 304-5000</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29684 Initial Form 27 Document #: 403418873

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>123-31167</u>	County Name: <u>WELD</u>
Facility Name: <u>KOHLHOFF USX AB 17-03P</u>	Latitude: <u>40.577960</u>	Longitude: <u>-104.576260</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>17</u>	Twps: <u>7N</u>	Range: <u>64W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? No 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

The Location is within a Pronghorn Winter Concentration Area.

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 Colorado Energy & Carbon Management Commission (ECMC) Rule 911, site investigations were conducted by a previous consultant pertaining to the KOHLHOFF USX AB #17-03P wellhead cut and cap and flowline abandonment. On February 23, 2024, initial wellhead characterization sampling was completed by a previous consultant following cut and cap operations and on April 9, 2024, a previous consultant completed flowline characterization sampling following the abandonment of the flowline. See Documents 403979075 (In Process) and 40397907 for sit investigation details prior to 2025.

On July 24, 2025, Confluence Compliance Companies, LLC (Confluence) provided sampling support at the wellhead and flowline to recharacterize potential soil impacts identified by initial site investigation. Using hand tools and a hammer drill, two soil samples were collected: one from 7 feet below ground surface (bgs) at the previous wellhead sample location (WH-FS-01) collected by the previous consultant on February 23, 2024, and one flowline recharacterization sample was collected from 5 feet bgs at the previous sample location of FL-SS-02 collected by the previous consultant on April 9, 2024. Five background soil samples were also collected nearby, undisturbed areas at depths of 5 and 7 feet bgs to characterize native concentrations of inorganics in the area. Analytical results of the wellhead recharacterization sample indicate compliance with applicable standards except for pH, arsenic, barium, and selenium. Analytical results of the flowline recharacterization sample indicate compliance with applicable standards except for pH, arsenic, lead, and selenium. Analytical results from background samples indicate peak native inorganic values as follows: 8.29 (pH), 1.10 millimhos per centimeter (mmhos/cm), 3.37 (SAR), 1.20 milligrams per liter (mg/L) (boron), 3.89 mg/kg (arsenic), 155 mg/kg (barium), 0.645 mg/kg (cadmium), 0.15 mg/kg. See the attached Report of Work (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 background soil samples will be collected to further establish the natural range of inorganic constituents in the project area. Backgrounds will be submitted for analysis of Table 915-1 inorganics. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further sampling will be completed to delineate the extent of impacts from pH identified in samples WH01 and FL01. 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 full 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 wellhead and flowline areas occurred during site investigation activities. Field personnel assessed all disturbed areas for indications of past spills, such as staining or salt accumulation, with direction to collect samples and report any areas of concern. No areas of concern have been reported.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 2
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 4.1
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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
0 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 February 23 and April 9, 2024, two background soil samples were collected. One background sample was analyzed for SSRs only and the other was analyzed for Table 915-1 inorganics. See Document 403979075 (In Process) for details.

Five background samples were collected on July 24, 2025, and analyzed for Table 915-1 inorganics. The maximum background concentration calculated using a 1.25x multiplier for arsenic was 4.86 milligrams per kilogram (mg/kg), barium was 194 mg/kg, and selenium was 0.643 mg/kg. The maximum pH value was 8.29. See the attached ROWC for details.

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?

As part of Chevron's Data Integrity review, all point of compliance samples were recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. Additional background soil samples will be collected to further establish the natural range of inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further sampling will be completed to delineate the extent of impacts from pH exceedances.

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 soil exceedances resulting from oil and gas operations have been identified. Should impacted material be identified at any point during the site investigation, a removal summary will be provided.

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.

No soil exceedances resulting from oil and gas operations have been identified. Should impacted material be identified at any point during the site investigation, a remedial investigation will be undertaken and a summary of those efforts will be provided

Soil Remediation Summary

In Situ

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

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ Land Treatment
- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Other _____

Groundwater Remediation Summary

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

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Groundwater was not encountered during 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 Quarterly Update and SSI Report

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policy MWZZ 316714 and 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 completed 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. 10/31/2025

Proposed date of completion of Reclamation. 10/31/2027

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. 05/11/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/23/2024

Proposed site investigation commencement. 07/01/2023

Proposed completion of site investigation. 12/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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 adjusted to reflect the status of site investigation efforts and anticipated dates for completion. Additional site investigation to characterize native soil conditions is tentatively scheduled to be completed by the end of fourth quarter 2025 and results will be reported in a subsequent Form 27. Remediation dates have been removed from this submittal as no active remediation is planned at this time. Should the SSIP indicate the need for remedial activities, a schedule will be provided.

OPERATOR COMMENT

This form has been submitted to satisfy the quarterly reporting requirement for the Kohlhoff USX AB #17-03P (Remediation Project 29684). SSI activities were completed by Confluence on July 24, 2025. Based on the results of these efforts, all organic constituents of concern are within applicable standards. Additional background sampling to evaluate elevated pH values within the investigation areas relative to the natural range of inorganic values in the project area will be completed.

Due to the estimated groundwater depth of more than 50 feet bgs, the lack of groundwater encountered during site investigation activities at the Location, and the absence of hydrocarbon indicators based on field-screening, a pathway to groundwater does not appear to exist. Chevron plans to request closure under Residential Soil Screening Levels (RSSLs), rather than the more restrictive Protection of Groundwater Soil Screening Levels (PGSSLs). With these screening levels, the lead detected in FL01 would no longer be considered a limiting factor for site closure. In conjunction with a larger more representative range of background values for inorganic constituents, Chevron plans to request closure of this project under alternate allowable limits based on RSSLs and background accommodations provided as Footnote 11 to ECMC Table 915-1. 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.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Chris McKisson

Title: Sr. Scientist/Partner

Submit Date: _____

Email: CVX-REMS@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: 29684

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**

404379434	ANALYTICAL RESULTS
404379438	ANALYTICAL RESULTS
404385353	SITE INVESTIGATION REPORT

Total Attach: 3 Files

General Comments**User Group****Comment****Comment Date**

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)