

October 8, 2025

NOBLE ENERGY, INC. (Operator: 100322)
C/O Lauren Hoff
Lead Regulatory Affairs Coordinator
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Report of Work Completed – Facility Closure Investigation

ECMC Location Name (ID)	KOHLHOFF USX AB/17-03P (415756)
ECMC Well Name (API)	KOHLHOFF USX AB #17-03P (05-123-31167)
Client Location Name	Kohlhoff USX AB #17-03P
ECMC Remediation Project	29684
Legal Description	NENW Sec. 17 T7N-R64W
Coordinates (Lat, Long)	40.577960, -104.576260
County	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 conducted on July 24, 2025, associated with the wellhead cut and cap and flowline removal at KOHLHOFF USX AB #17-03P (API: 05-123-31167) (Location). Soil sampling and analysis confirm that all organic constituents of concern are within applicable standards. Confluence recommends collecting additional background samples to evaluate elevated pH values within the investigation areas relative to the natural range of inorganic values in the surrounding area.

The Location is approximately 3.87 miles north of Galeton, Colorado, in Weld County as illustrated in the attached Topographic Location Map. Additional information on the Location and the associated remediation project is provided in the title block above and the attached Site Diagrams. This ROWC provides background on the project, the scope of work used to complete the investigation, results of the investigation, and recommendations for how to proceed with this information.

Project Background

On February 23, 2024, initial wellhead characterization sampling was conducted by a previous consultant following cut and cap operations at the Location, pursuant to the ECMC Rule 911. Nine soil samples were collected for field screening, and one soil sample was submitted for analysis of ECMC Table 915-1 organics, and Soil Suitability for Reclamation (SSR) constituents. Analytical results of the initial wellhead characterization sample were compliant with applicable standards for all analyzed constituents. One background soil sample was collected and submitted for analysis of SSR constituents; the background soil sample was later discovered to have been collected in an area previously disturbed by oil and gas operations and is not considered representative of native conditions. See ECMC Document 403979075 (In Process) for details.

On April 9, 2024, a previous consultant completed flowline characterization sampling following the abandonment of the flowline. Two samples were collected for field-screening, and one sample, collected at the flowline connection to the separator, was submitted for analysis of all Table 915-1 constituents. Analytical results of the flowline characterization sample were compliant with all

applicable standards except for pH and arsenic. Additionally, one background soil sample was collected and analyzed for Table 915-1 inorganics (SSR and metal constituents). Analytical results of the background sample indicated elevated native levels of pH, arsenic, and barium. See Document 403979075 (In Process) for details.

Scope of Work

On July 24, 2025, Confluence provided sampling support at the wellhead and flowline to recharacterize potential soil impacts identified by initial site investigation. Using hand tools and a power auger, 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.

All samples were field-screened using visual and olfactory observations and a photoionization detector (PID). Field observations were documented in bound field notebooks, digital photographs, and with geographic positioning systems (GPS) meeting established accuracy requirements.

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 loam and the soil classification is characterized by the Natural Resources Conservation Service (NRCS) as Olney Fine Sandy Loam.

Although precise groundwater depth data at the Location is unavailable, Division of Water Resources (DWR) well permits 154419- and 256559-, located approximately 1.14 miles north and 0.88 miles southwest of the Location, respectively, report groundwater depths of approximately 175 and 40 feet bgs and sit at elevations of 4,952 and 4,877 feet above mean sea level (AMSL), respectively. These wells represent the nearest applicable upgradient and downgradient water level information. The Location sits at an approximate elevation of 4,928 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 50 feet bgs. Groundwater has not been observed during site investigations related to this project.



Wellhead Recharacterization Results

Field-screening did not indicate the presence of hydrocarbon impacts. Analytical results of the wellhead recharacterization sample indicate compliance with applicable standards except for pH, arsenic, barium, and selenium, at values of 8.45, 3.13 mg/kg, 89.3 mg/kg, and 0.415 mg/kg, respectively.

Flowline Recharacterization Results

Field-screening did not indicate the presence of hydrocarbon impacts. Analytical results of the flowline recharacterization sample indicate compliance with applicable standards except for pH, arsenic, lead, and selenium, at values of 8.31, 3.71 mg/kg, 15.2 mg/kg, and 0.302 mg/kg, respectively.

Background Results

Analytical results from background samples indicate 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 (hexavalent chromium), 29.9 mg/kg (nickel), and 0.514 mg/kg (selenium).

Recommendations and Analysis

Based on soil sampling completed by Confluence to date, all organic constituents of concern are within RSSLs. Levels of arsenic exceeding applicable standards remain in the wellhead and flowline investigation areas. However, site-specific background data indicate that these levels are within native conditions. All background soil samples were collected from areas in nearby, undisturbed locations and from the same soil profile as the investigation areas. Based on identical soil classification and proximity to the site investigation areas, it is reasonable to conclude that elevated levels arsenic observed at the Location are consistent with native conditions rather than attributable to oil and gas operations. All documented exceedances are within the maximum background concentration of 4.86 mg/kg, calculated using the 1.25x multiplier per Table 915-1 Footnote 11.

Values of pH exceeding applicable standards remain in samples collected from the wellhead and flowline investigation areas (WH01 and FL01). While these exceedances have not yet been conclusively cleared with background data, they are likely consistent with naturally occurring values in the area. Confluence recommends collecting an additional 10 background samples (five locations, each sampled at 5 ft and 7 ft bgs) on nearby undisturbed land with comparable soil classification to better establish the natural range of inorganic constituent concentrations.

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 can 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 can request closure of this project under alternate allowable limits based on RSSLs and background accommodations provided as Footnote 11 to ECMC Table 915-1.



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 Kohlhoff USX AB #17-03P (Remediation Project 29684). 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 COCs 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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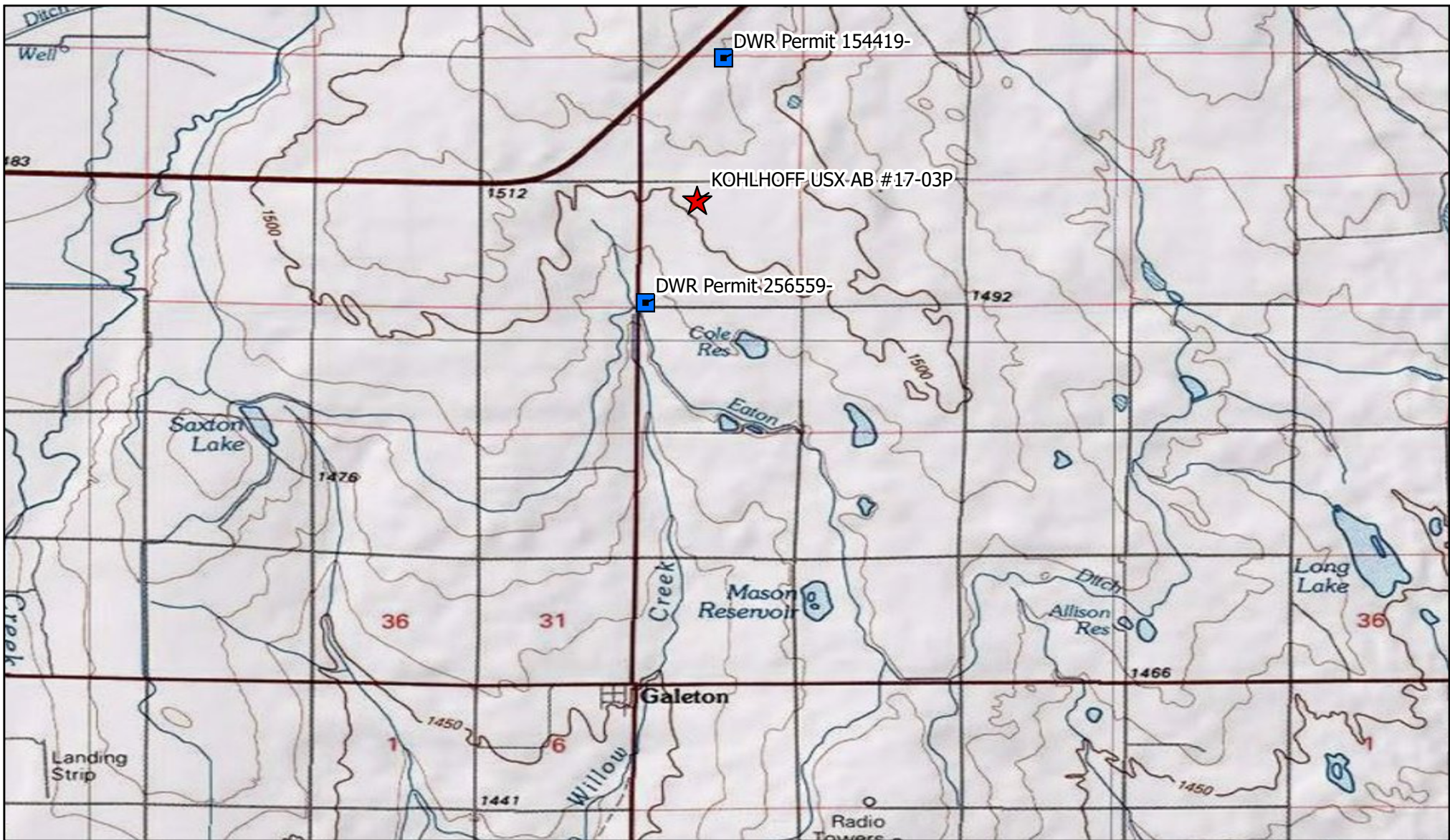


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Attachments

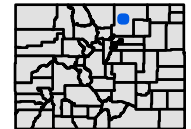
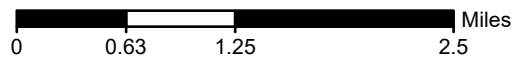
- Topographic Location Map
- Site Diagram – Project Overview
- Table 1 – Field Data Summary Table
- Table 2 – Summary of Volatile Organic Soil Chemistry Data
- Table 3 – Summary of Polycyclic Aromatic Hydrocarbon Soil Chemistry Data
- Table 4 – Summary of Soil Suitability for Reclamation
- Table 5 –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





Topographic Location Map

operator name (#): NOBLE ENERGY, INC. (100322)
 name (API/ID): KOHLHOFF USX AB #17-03P (05-123-16489)
 legal description: NENW Sec. 17 T7N-R64W
 city, county: Unincorporated, Weld County
 lat, long: 40.577960, -104.576260



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COMPLIANCE COMPANIES

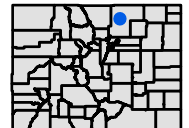
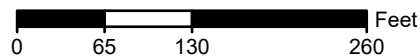
Topographic data presented in this map were sourced from publicly available datasets and other referenced sources. While care has been taken to ensure accuracy, discrepancies may occur due to variations in data resolution, projection, and field conditions. Map features and boundaries are approximate 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 - Site Investigation

operator name (#): NOBLE ENERGY, INC. (100322)
 name (API/ID): KOHLHOFF USX AB #17-03P (05-123-31167)
 legal description: NENW Sec. 17 T7N-R64W
 city, county: Unincorporated, Weld
 lat, long: 40.577960, -104.576260

- Soil Sample: Collected by Previous Consultant (2/23/2024)
- Soil Sample: Collected by Previous Consultant (4/9/2024) Recharacterized by Confluence (7/24/2025)
- Background Soil Sample: Collected by Confluence (7/24/2025)
- Soil Sample: Collected by Confluence (7/24/2025)
- Proposed Background Soil Sample
- Approximate Flowline (Abandoned in Place)
- NRCS Soil Survey: Map Unit Boundary



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
KOHLHOFF USX AB 17-039P, WELD COUNTY, COLORADO
REM # 29684

Sample ID	Sample Date	Depth (ft)	GPS Data		VOC Concentration (ppm)
			Latitude	Longitude	
WH01@7'	7/24/2025	7	40.577962	-104.576258	0.1
FL01@5'	7/24/2025	5	40.578035	-104.575273	0.1
BKG03@5'	7/24/2025	5	40.578306	-104.575195	0.4
BKG04@7'	7/24/2025	7	40.578384	-104.575668	0.4
BKG05@7'	7/24/2025	7	40.578414	-104.576788	0.2
BKG02@5'	7/24/2025	5	40.577668	-104.575331	0.3
BKG01@5'	7/24/2025	5	40.577393	-104.575805	0.2

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).

ppm = Parts per million

ft = Feet

NA - Not Analyzed

TABLE 2
SUMMARY OF VOLATILE ORGANIC SOIL CHEMISTRY DATA
NOBLE 100322
KOHLHOFF USX AB 17-039P, WELD COUNTY, COLORADO
REM # 29684

Sample ID	Sample Date	Depth (ft)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Xylenes (mg/kg)	1,2,4-Trimethyl-Benzene (mg/kg)	1,3,5-Trimethyl-Benzene (mg/kg)	Naphthalene (mg/kg)	TPH (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (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**		
WH01@7'	7/24/2025	7	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.002	<500	<0.200	<25.0	<100
FL01@5'	7/24/2025	5	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.002	<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
KOHLHOFF USX AB 17-039P, WELD COUNTY, COLORADO
REM # 29684

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
WH01@7'	7/24/2025	7	<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@5'	7/24/2025	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
KOHLHOFF USX AB 17-039P, WELD COUNTY, COLORADO
REM # 29684

Sample ID	Sample Date	Depth (ft)	pH (Standard Units)	EC (mmhos/cm)	SAR (Standard Units)	Boron (mg/L)
ECMC Table 915-1 Soil Suitability Limits			6 - 8.3	<4	<6	2
WH01@7'	7/24/2025	7	8.45	0.531	4.10	0.671
FL01@5'	7/24/2025	5	8.31	0.781	2.18	0.709
BKG03@5'	7/24/2025	5	8.29	0.210	0.109	<0.100
BKG04@7'	7/24/2025	7	8.20	0.210	0.218	<0.100
BKG05@7'	7/24/2025	7	8.13	1.10	2.14	1.10
BKG02@5'	7/24/2025	5	8.17	0.876	2.48	0.828
BKG01@5'	7/24/2025	5	8.12	1.06	3.37	1.20
Maximum Background Concentration			8.29	1.10	3.37	1.20

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

EC = Specific Conductance

SAR = Sodium Adsorption Ratio

mg/L = milligrams per liter

mmhos/cm = millimhos per centimeter

TABLE 5
SUMMARY OF METALS IN SOIL CHEMISTRY DATA
NOBLE 100322
KOHLOFF USX AB 17-039P, WELD COUNTY, COLORADO
REM # 29684

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
WH01@7'	7/24/2025	7	3.13	89.3	0.352	<0.20	<41.4	<12.6	<23.4	0.415	<0.721	<333
FL01@5'	7/24/2025	5	3.71	78.7	<0.364	<0.19	<44.1	15.2	<24.9	0.302	<0.767	<355
BKG03@5'	7/24/2025	5	3.08	100	<0.359	<0.20	<43.5	<13.2	<24.6	<0.246	<0.756	<350
BKG04@7'	7/24/2025	7	3.65	<71.8	<0.333	<0.20	<40.3	<12.3	<22.8	0.514	<0.701	<324
BKG05@7'	7/24/2025	7	3.89	155	<0.353	0.09	<42.8	<13.0	<24.2	0.322	<0.743	<344
BKG02@5'	7/24/2025	5	2.62	<71.0	0.645	<0.21	<39.8	<12.1	<22.5	0.404	<0.693	<320
BKG01@5'	7/24/2025	5	3.38	119	0.555	0.15	<42.2	<12.8	29.9	0.487	<0.734	<339
1.25x Maximum Background Concentration			4.86	194	0.806	0.19	-	-	37.4	0.643	-	-

- 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

bgs = Below ground surface

* Indicates laboratory minimum detection limit in excess of SSL

NA - Not analyzed



Photographic Log

Facility Closure Investigation
KOHLMHOFF USX AB #17-03P (API: 05-123-31167)



Hydro vac WH01: Facing West



Photographic Log

Facility Closure Investigation
KOHLMHOFF USX AB #17-03P (API: 05-123-31167)



Hydro Vac FL01: Facing Northeast



Photographic Log

Facility Closure Investigation
KOHLHOFF USX AB #17-03P (API: 05-123-31167)



Boring FL01 Location



Photographic Log

Facility Closure Investigation

KOHLHOFF USX AB #17-03P (API: 05-123-31167)



Soil Boring BKG03@5' Location



Photographic Log

Facility Closure Investigation
KOHLEHOFF USX AB #17-03P (API: 05-123-31167)

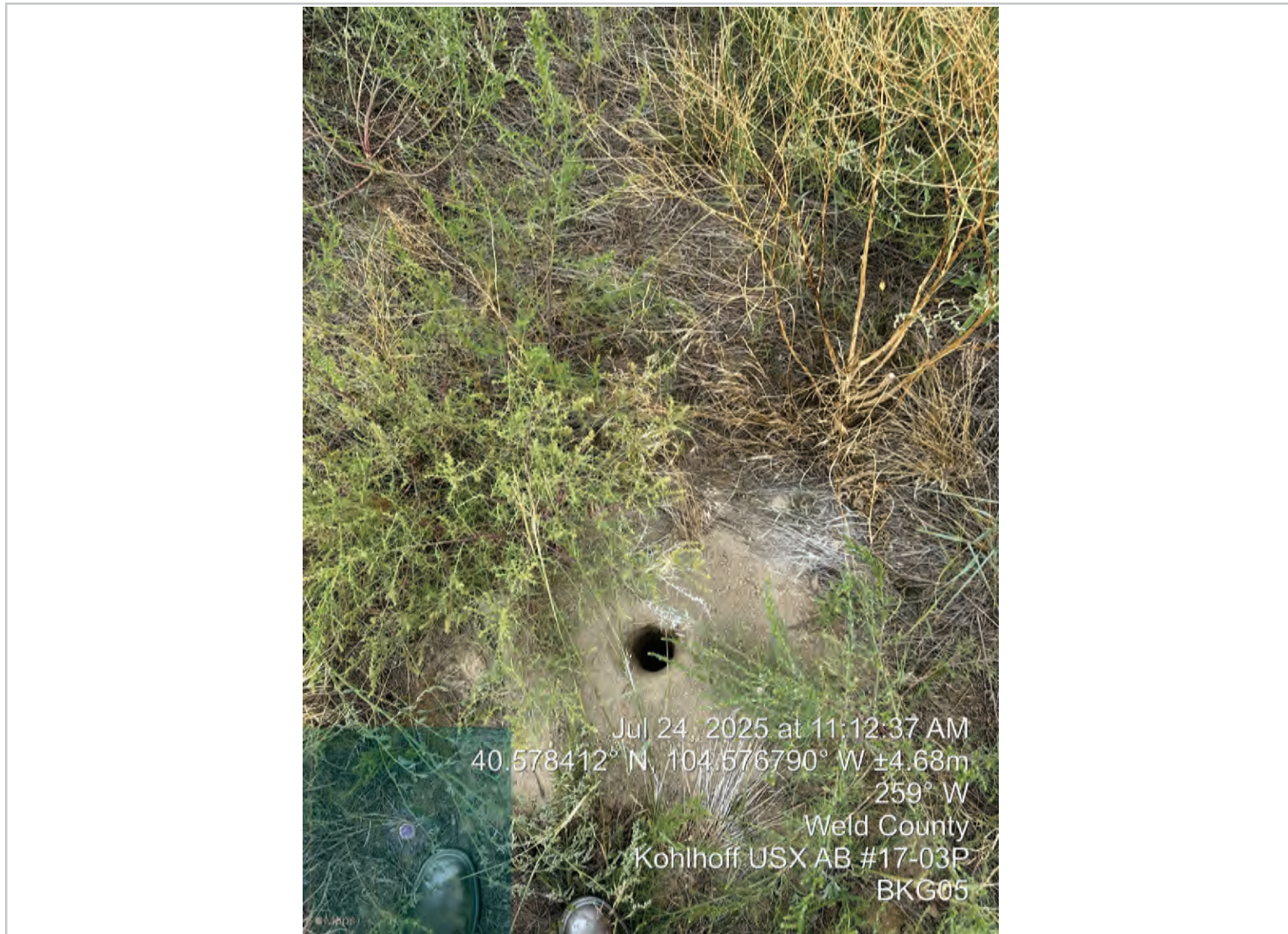


Soil Boring BKG04 Location



Photographic Log

Facility Closure Investigation
KOHLHOFF USX AB #17-03P (API: 05-123-31167)



Soil Boring BKG05 Location



Photographic Log

Facility Closure Investigation
KOHLHOFF USX AB #17-03P (API: 05-123-31167)



Soil Boring BKG02 Location



Photographic Log

Facility Closure Investigation

KOHLHOFF USX AB #17-03P (API: 05-123-31167)



Soil Boring BKG01 Location