

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404309113
Receive Date:
08/11/2025

Report taken by:
Nick Cholas

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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers Phone: <u>(832) 349-0757</u> Mobile: <u>()</u>
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>lauren.hoff@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19760 Initial Form 27 Document #: 402776034

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>123-17906</u>	County Name: <u>WELD</u>
Facility Name: <u>UPRC 9-1116</u>	Latitude: <u>40.325320</u>	Longitude: <u>-104.791580</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSW</u>	Sec: <u>9</u>	Twp: <u>4N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Range Land
 Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes
 Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

High Priority Habitat - Rule 1202.d Density Habitats, Mule Deer Migration Corridor
Freshwater Pond 0.09mi NE
Freshwater Emergent Wetland 0.1mi E, 0.2mi S
Riverine 0.14mi E, 0.1mi SE, 0.19mi S
Forested/Shrub Riparian 0.22mi N
Farming Structure/Shed 0.22mi E

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
No	GROUNDWATER	Refer to ECMC Doc #404254251	Lab analysis and field screening
Yes	SOILS	Refer to ECMC Doc #404254251	Lab analysis and field screening

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the UPRC 09-1116 wellhead cut and cap and flowline decommissioning. Approximately 150' of the flowline was removed, and approximately 30' of the flowline was abandoned in place, as per Form 44 Document #402879114. The wellhead was cut and capped per ECMC rules.

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 soil samples were collected for analysis by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, and boron.

Grab soil samples were collected along the flowline at the directional changes, and at the end point of the removed section of flowline. All soil samples were analyzed as described above.

Proposed Groundwater Sampling

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

Groundwater was encountered during site investigation activities. A temporary groundwater monitoring well was installed at the excavation to determine if groundwater was impacted. A groundwater sample was collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene. Analytical results are attached to ECMC Document #403347811.

On March 31 and April 4, 2025 groundwater was encountered during site investigation activities. Four groundwater samples were collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene. Analytical results are pending and will be submitted on a subsequent Form 27.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 20
Number of soil samples exceeding 915-1 5
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 500

NA / ND

-- Highest concentration of TPH (mg/kg) 192
-- Highest concentration of SAR 2.02
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 3
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 5
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____
ND Highest concentration of Toluene (µg/l) _____
ND Highest concentration of Ethylbenzene (µg/l) _____
ND Highest concentration of Xylene (µg/l) _____
NA 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 March 31, 2025, fifteen background soil samples were collected near the wellhead from five discrete locations (BKG02-BKG06) and analyzed for pH, EC, SAR, boron, and Table 915-1 metals per ECMC standards. Background soil samples were collected from depths ranging from approximately 2-3 feet to 4-5 feet below ground surface. The maximum and minimum background concentration for pH were observed to be 8.25 and 5.18, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic and lead were observed to be 2.33 mg/kg and 15.1 mg/kg, respectively. Concentrations of pH, boron, and arsenic remain in exceedance of the applicable ECMC regulatory standards and outside of background levels. Background sampling activities and analytical results were reported under the associated Five Rivers K09-28D Tank Battery (REM #30784) on ECMC Document Number 404254251, which is in process and pending approval at the time of this submittal.

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?

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.

Refer to the Remediation Summary section below.

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.

Decommissioning analytical results indicated that organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all soil sample locations. Based on the remaining analytes, a supplemental site investigation (SSI) was completed on March 31 and April 4, 2025 to confirm and delineate the boron exceedance observed at FL01-A@3' during decommissioning activities. Additionally, soil samples were collected via hand auger at the directional changes and at the end of the removed section of flowline. All samples were collected for the full 915-1 suite.

Analytical results from the March and April, 2025, SSI activities indicated that the benzo(a)anthracene concentration observed at soil sample SB09@3-4' was in exceedance of the ECMC regulatory standard. Concentrations of pH, boron, and arsenic remain in exceedance of the applicable ECMC regulatory standards and outside of background levels in soil samples FL01-A@3', SB10@4-5', SB 13@6-7', SB15@3-4', SB16@3-4', and SB17@3-4'. A detailed summary of the March and April, 2025, SSI activities was submitted under the associated Five Rivers K09-28D Tank Battery (REM #30784) on ECMC Document Number 404254251, which is in process and pending approval at the time of this submittal.

Due to the organic exceedance being located on the already reportable Five Rivers K09-28D Tank Battery (REM #30784) pad, Noble is requesting to close this remediation number (REM#19760), and move all further remediation activities associated with the UPRC 09-1116 wellhead and flowline to the Five Rivers K09-28D Tank Battery project. This request was also detailed in ECMC Document Number 404254251 (reported under REM #30784), which is in process and pending approval at the time of this submittal.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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 encountered during site investigation activities. A temporary groundwater monitoring well was installed at the excavation to determine if groundwater was impacted. A groundwater sample (GW-01) was collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene. No organic exceedances were observed in the groundwater sample.

On March 31, 2025, on background groundwater sample (BKG-GW01) was collected from the BKG02 background soil boring location during site investigation activities and submitted for analysis of TDSD, chloride, and sulfate.

On April 4, 2025 groundwater was encountered during site investigation activities. Two groundwater samples (GW02&GW03) were collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene and ECMC Table 915 groundwater inorganic compounds.

Organic compound concentrations were in compliance with the applicable ECMC regulatory standards in groundwater samples GW02 and GW03. Inorganic compound concentrations were in compliance with the applicable ECMC regulatory standards or within 1.25x background levels in groundwater samples GW02 and GW03. A detailed summary of groundwater sampling activities and analytical results was submitted under the associated Five Rivers K09-28D Tank Battery (REM #30784) on ECMC Document Number 404254251, which is in process and pending approval at the time of this submittal.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

Request Alternative Reporting Schedule:

Semi-Annually Annually Other Administrative Closure Request

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 Administrative Closure Request

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).
If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policies MWZZ316714 and MWZX316724) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: \$ 0 _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes _____

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? No _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 09/09/2021

Proposed date of completion of Reclamation. 10/04/2025

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. 04/22/2021

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/01/2021

Proposed site investigation commencement. _____

Proposed completion of site investigation. 04/04/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. 04/04/2025

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 update to reflect the completion of March and April, 2025, supplemental site investigation activities at the UPRC 09-1116 wellhead and flowline location. Due to the proximity to the Five Rivers K09-28D Tank Battery (REM #30784) pad, Noble is requesting to close this remediation number (REM#19760), and move all further remediation activities associated with the UPRC 09-1116 wellhead and flowline to the Five Rivers K09-28D Tank Battery project. This request was also detailed in ECMC Document Number 404254251 (reported under REM #30784), which is in process and pending approval at the time of this submittal.

OPERATOR COMMENT

This Form 27 is being submitted to request administrative closure for the UPRC 09-1116 wellhead and flowline project (REM #19760).

A summary of flowline decommissioning activities and analytical results were included on ECMC Document Number 403347811.

Decommissioning analytical results indicated that organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all soil sample locations. Based on the remaining analytes, a supplemental site investigation (SSI) was completed on March 31 and April 4, 2025 to confirm and delineate the boron exceedance observed at FL01-A@3' during decommissioning activities. Additionally, soil samples were collected via hand auger at the directional changes and at the end of the removed section of flowline. All samples were collected for the full 915-1 suite.

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Due to the organic exceedance being located on the already reportable Five Rivers K09-28D Tank Battery (REM#30784) pad, Noble is requesting to close this remediation number (REM#19760), and move all further remediation activities associated with the UPRC 09-1116 wellhead and flowline to the Five Rivers K09-28D Tank Battery project. This request was also detailed in ECMC Document Number 404254251 (reported under REM #30784), which is in process and pending approval at the time of this submittal.

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

Signed: Jimmy Webster

Title: Environmental Consultant

Submit Date: 08/11/2025

Email: jwebster@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: 10/24/2025

Remediation Project Number: 19760

COA Type

Description

0 COA	
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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

404309113	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

Environmental	ECMC has processed this form as an update without technical review; no analytical was attached thus approval of this form does not imply any agreement with comments on completion of site investigation or alteration of site plan. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.	10/24/2025
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Total: 1 comment(s)