FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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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 INFORMATON

Name of Operator: NOBLE ENERGY INC Operator No: 100322
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Lauren Hoff Email: rbueuf27@chevron.com

Phone Numbers
Phone: (970) 304-5000
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34770 Initial Form 27 Document #: 403703611

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.
- [X] 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.
- [X] 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

Yes Multiple Facilities

Facility Type: Facility ID: API #: County Name:
Facility Name: Latitude: Longitude:
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: Sec: Twp: Range: Meridian: Sensitive Area?

SITE CONDITIONS

General soil type - USCS Classifications SM
Most Sensitive Adjacent Land Use Cropland
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

Aquatic Native Species Conservation Waters HPH 0.14mi W
Freshwater Emergent Wetland 0.1mi E, 0.23mi W, 0.25mi NE
Freshwater Pond 0.19mi NW, 0.22mi SW
Residential 0.22mi W
Farm Structure 0.21/0.22mi W

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

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 ECMC Doc # 404141320	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 by Chevron business partners pertaining to the ARENS G26-19 wellhead cut and cap. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the ARENS G26-19 flowline removal and partial abandonment by Tasman Inc. on 08/07/2024. Approximately 670' of flowline was removed, however, approximately 2295' of the flowline was abandoned-in-place due to field constraints. The Form 44 document number associated with the flowline abandonment (#403975459) is included under Related Forms. The ECMC will be updated in a supplemental Form 27 if the abandoned portion is able to be removed. So as to not disturb the area of field constraint, soil samples were taken at the start and endpoint of the flowline where the area exists. Soil samples will also be taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Soil sample SEP01-FL@3' was collected during the decommissioning of the associated facility, Beebe Draw T432 R65W S26 L04 (Remediation #34682), to serve as the flowline-separator riser sample.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

A grab soil sample was collected by a Chevron business partner at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation (WH01@6' and FLR01@4'). Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead (WH01-N@4', WH01-S@4', and WH01-W@4'). Soil samples were taken by Tasman Inc. at the start and endpoint of the flowline (FL01-04@4' and FL01-05@2'). Soil samples were analyzed for the full extent of Table 915-1, including but not limited to: TPH, organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods. The confirmation soil samples collected during wellhead cut and cap activities were determined to be outside of the required temperature preservation range when delivered to the laboratory. Resampling will be conducted.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater sample will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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 of the wellhead and flowline occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of wellhead and flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to the previously submitted Form 27, document number 404036384.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 5
Number of soil samples exceeeding 915-1: 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet): 100

NA / ND

ND — Highest concentration of TPH (mg/kg):
-- — Highest concentration of SAR: 11.2
BTEX > 915-1: No
Vertical Extent > 915-1 (in feet): 4

Groundwater

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

Highest concentration of Benzene (µg/l):
Highest concentration of Toluene (µg/l):
Highest concentration of Ethylbenzene (µg/l):
Highest concentration of Xylene (µg/l):
Highest concentration of Methane (mg/l):

Surface Water

0 Number of surface water samples collected
Number of surface water samples exceeding 915-1
If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

[ ] Were impacts to adjacent property or offsite impacts identified?

[X] Were background samples collected as part of this site investigation?

On 08/07/2024, three background samples were collected from one discrete location (BKG01) during decommissioning adjacent to the flowline. On 02/07/2025, nine background soil samples were collected from three discrete locations (BKG02-BKG04) during remedial excavation activities at soil sample location FL01R-W@2'. Background soil samples were collected from depths ranging between 2 to 5 feet below ground surface (ft bgs) and analyzed for metals in soil per ECMC Table 915-1, pH, EC, SAR and boron. The maximum background concentrations for pH, EC, and SAR were detected to be 8.41, 7.64 mmhos/cm, and 11.8, respectively. The maximum background concentration with a 1.25x multiplier applied for arsenic was calculated to be 2.11 mg/kg. All pH concentrations detected during remedial excavation activities were below background levels.

[ ] Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards):
Volume of liquid waste (barrels):

[X] Is further site investigation required?

Following flowline removal activities and concurrently with the remedial excavation proposed in the Remedial Action Plan section of this Form 27, additional background samples will be collected to determine if elevated arsenic is attributed to native soil conditions at the site. Proposed background soil sample locations are shown on the proposed excavation map attached to previously submitted Form 27 Doc #404141320. The confirmation soil samples collected during wellhead cut and cap activities were determined to be outside of the required temperature preservation range when delivered to the laboratory. Re-sampling will be conducted at the WH01@6' sample location. As the flowline endpoint sample SEP01-FL@3' was collected under the Beebe Draw T4N R65W S26 L04 Tank Battery, all further site investigation to address the pH exceedance observed at sample location SEP01-FL@3' will proceed under Remediation #34682.

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.

The benzo(a)anthracene exceedance observed at sample location FL01R-W@2' during decommissioning was removed through remedial excavation. Remedial excavation samples were collected and analyzed for full ECMC Table 915-1 constituents.

Following flowline removal, the benzo(a)anthracene exceedance observed at sample location FL01-04@4' will be removed through a remedial excavation.

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.

Pursuant to the FL01R-W@2' release area, a total of approximately 30 cubic yards of impacted material were removed for off-site disposal at the North Weld Landfill in Ault, Colorado under signed Noble waste manifest. A total of approximately 30 cubic yards of imported clean fill was used to backfill the excavation. The final remedial excavation extent measured approximately 10 ft. by 10 ft. by 4 feet below ground surface (ft. bgs).

Remedial excavation confirmation soil samples for the proposed remedial excavation at sample location FL01-04@4' will be collected and analyzed for full ECMC Table 915-1 constituents. The results of the remedial excavation will be submitted on a subsequent Form 27.

Soil Remediation Summary

☐ **In Situ**

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

☒ **Ex Situ**

- Yes Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) 30
  - 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 and remedial excavation activities.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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

[X] Other 4Q25 - Timeline Update

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: $ 50000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use has been determined at this time.

Volume of E&P Waste (solid) in cubic yards 30

E&P waste (solid) description Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: North Wel Landfill

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

If YES:

[ ] Compliant with Rule 913.h.(1).

[ ] Compliant with Rule 913.h.(2).

[ ] Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? 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?

[X] 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. 05/17/2024

Proposed date of completion of Reclamation. 04/09/2027

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. 02/29/2024

Actual Spill or Release date, or date of discovery. 08/14/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/17/2025

Proposed site investigation commencement. 10/09/2025

Proposed completion of site investigation. 04/09/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/09/2025

Proposed date of completion of Remediation. 10/09/2026

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

[X] Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The implementation schedule has been updated to reflect a change in start work dates. The proposed remedial excavation and wellhead resampling will be completed concurrently and do not have a tentative commencement date as of the submission of this Form 27, but is expected to commence in the First Quarter 2026. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

OPERATOR COMMENT

This Form 27 is being submitted as a 4Q25 timeline update for the proposed remedial excavation and wellhead resampling at the Arens G26-19 flowline location. The wellhead was cut and capped on 5/27/24 and the flowline was removed on 8/27/24. A detailed summary of wellhead and flowline decommissioning activities can be found attached to Form 27 Doc #s 404143692 and 404036384, respectively. The benzo(a)anthracene exceedance observed at sample location FL01R-W@2' during decommissioning was removed through remedial excavation on 2/7/2025 and a detailed summary can be found attached to Form 27 Doc #404141320.

The implementation schedule has been updated to reflect a change in start work dates. The proposed remedial excavation and wellhead resampling will be completed concurrently and do not have a tentative commencement date as of the submission of this Form 27, but is expected to commence in the First Quarter 2025. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

The results of the proposed remedial excavation and wellhead resampling will be submitted on a subsequent Form 27. 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: Collin Barker Title: Environmental Consultant

Submit Date: 10/06/2025 Email: tas-chevron-1@tasman-geo.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Date:

Remediation Project Number: 34770

COA Type | **Description**

0 COA

DENIED

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
404354932	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

General Comments

User Group	Comment	Comment Date
Environmental	ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location. Per Rule 912.a.(1-2): Immediately upon discovering any Spills or Releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas that meet the criteria of Rules 912.b.(1).H, I, or J, regardless of size or volume, Operators will control and contain the Spill or Release to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and should request expedited review if necessary. Operator shall conduct work in compliance with previously approved workplans and the 900 Series Rules. In accordanc	10/27/2025

Total: 1 comment(s)