

**FORM
INSP**

Rev
X/20

**State of Colorado
Energy and Carbon Management Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

09/04/2025

Submitted Date:

10/27/2025

Document Number:

718300081

FIELD INSPECTION FORM

Loc ID 490423 Inspector Name: Anderson, Laurel On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

ECMC Operator Number: 100322
Name of Operator: NOBLE ENERGY INC
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202

Findings:

3 Number of Comments
0 Number of Corrective Actions
 Corrective Action Response Requested

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
Brown, Kari		kari.oakman@state.co.us	
Peterson, Dan		danpeterson@chevron.com	
Rollins, Grace		grace.rollins@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
, Inspections		rbucogccinspectionreports@chevron.onmicrosoft.com	All Chevron Inspections
Graber, Nikki		nikki.graber@state.co.us	
White, Jeff		jeffery.white@chevron.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
490422	TANK BATTERY	AC	06/09/2025		-	UPRC KARAKAKES 490422	EI

General Comment:

This is an ECMC Environmental Field Inspection to determine progress on a release reported on denied Form 19i/s Doc 404340244 associated with Remediation Project #41847. Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Form 19i/s Doc 404340244 was denied on September 9, 2025, with the following comment:

"Per ECMC Rule 905.a.(1) Operators will ensure that E&P Waste is properly stored, handled, transported, treated, recycled, or disposed to prevent threatened or actual adverse environmental impacts to air, water, soil, or biological resources, or to the extent necessary to ensure compliance with the concentration levels in Table 915-1, radiation control standards, and WQCC Regulation 41 numeric and narrative Groundwater quality standards and classifications, as incorporated by reference in Rule 901.b.

Attached documentation states: "Soil staining noted in the spoils pile used as backfill for the produced water vessel excavation.". Operator is out of compliance with ECMC Rule 905.

In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered.

This matter has been referred to ECMC Enforcement and the subject Form denied.
Operator shall submit a replacement Form 19 immediately."

A replacement Form 19 has not been received.

Operator states: "On 9/2/2025, the potential presence of impacted material(s) was identified via hydrocarbon odor and hydrocarbon staining during decommissioning activities at the UPRC KARAKAKES T3N-R65W-S13L01, tank battery, sample: PWV-SS01, located at the produced water vessel."

Attached Documentation (Doc #404340367):

Photo 1 Description: "Soil staining at the PWV-SS01 @3' produced water vessel sidewall sampling location (40.222893 -104.608561) at a depth of approximately three (3) feet bgs (PID: 298.6 ppm)."

Photo 2 Description: "Soil staining noted in the spoils pile used as backfill for the produced water vessel excavation."

A historic release was discovered at the produced water vessel on 9/2/2025 based on PID readings and visual/olfactory indicators observed in soil sample PWV-SS01. NOTE: Reporting of suspected/actual Spills or Releases is not contingent upon laboratory analysis of samples confirming exceedance of Table 915-1 standards. Table 915-1 specifies below visual detections limit.

Per ECMC Rule 905.a.(1) Operators will ensure that E&P Waste is properly stored, handled, transported, treated, recycled, or disposed to prevent threatened or actual adverse environmental impacts to air, water, soil, or biological resources, or to the extent necessary to ensure compliance with the concentration levels in Table 915-1, radiation control standards, and WQCC Regulation 41 numeric and narrative Groundwater quality standards and classifications, as incorporated by reference in Rule 901.b.

Spill Name: UPRC KARAKAKES T3NR65W-S13L01

Spill ID: TBD

REM 41847

Hydrocarbon odor and hydrocarbon staining were observed during decommissioning activities at the UPRC KARAKAKES T3N-R65W-S13L01, tank battery, sample: PWV-SS01 @3'.

Reported Date of Discovery: 09/02/2025

Remediation Project No: 41847

UPRC KARAKAKES Tank Battery Facility ID: 490422

UPRC KARAKAKES Location ID: 490423

Date of Inspection: 09/04/2025

This inspection has been tied to the Tank Battery Facility ID as a Spill ID has not been issued via an approved Form 19i.

Inspected Facilities

Facility ID: 490422 Type: TANK API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

ECMC Comments

Comment	User	Date
<p>Site status as of 9/4/2025: -Signage with emergency contact number is present on location (Photos 8 & 9) -The tank battery has been decommissioned -A ~300-bbl steel crude oil AST remains on location (Photos 1, 4, 5 & 7) -Flowlines and other unused equipment have been removed and are being stored in a roll-off dumpster on location (Photos 1-3 & 8). -The excavation associated with the removal of the produced water vessel (sample location PWV-SS01 @3') that was visible in photo documentation attached to Form 19i/s Doc #404340244 was not observed during ECMC's inspection and appeared to have been backfilled to grade. -Weeds were observed on location around the perimeter of the tank battery (Photos 1,2 & 4 -9)</p>	andersoln	10/27/2025

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
718300082	2025_0904_KARAKAKES T3N-R65W-S13L01 (490422) Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7302253
718300083	2025_0903_Form 19is Attachment Doc No 404340367	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7302254
718300084	2025_0903_Form 19is_404340244_Denied	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7302255