

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 INFORMATION

Name of Operator: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers Phone: (970) 730-7281 Mobile: ()
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28542 Initial Form 27 Document #: 403366185

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

Yes Multiple Facilities

Facility Type: LOCATION	Facility ID: 328516	API #: _____	County Name: WELD
Facility Name: DABNEY G-64N65W 25NENW	Latitude: 40.288686	Longitude: -104.613683	
** correct Lat/Long if needed: Latitude: 40.287133		Longitude: -104.613628	
QtrQtr: NENW	Sec: 25	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 485134	API #: _____	County Name: WELD
Facility Name: DABNEY G-64N65W 25NENW	Latitude: 40.286877	Longitude: -104.613571	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 25	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Rangeland _____

Is domestic water well within 1/4 mile? No _____

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

Holding Pond 0.22mi SSW
Farm Structures 0.16 SE
Feedlot 0.08 W, 0.12 S

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	Refer to Tab	Lab analysis and Field Screening
Yes	SOILS	70' x 45' x 25' BGS	Lab analysis

INITIAL ACTION SUMMARY

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

On September 9, 2023, a site investigation was conducted pursuant to ECMC Rule 911 at the DABNEY SHELTON T4N-R65W-S25 L01 Facility and Tank Battery location.

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 confirmation soil samples were collected from the produced water vessel excavation (SS01-SS04@2.5', FS01@5'), beneath the ground oil tank (AST01@0-6"), and at the risers for the flowline (SEP01-FL@4') and dumpline (SEP01-DL@4') of the separator. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

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

A site assessment was conducted between 12/15/2023 and 01/26/2024 to delineate impacted media. Eight soil borings were advanced in the area of impacts. Six of the eight soil borings were converted to temporary groundwater monitoring wells. Six groundwater samples were collected and analyzed for BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, 1-methylnaphthalene (M), 2-M, and inorganic parameters.

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 tank battery area 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 tank battery decommissioning activities including field notes, site photos, figures, and laboratory analytical results was attached to a previous Supplemental Form 27 (ECMC Document #403637141).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>39</u>	-- Highest concentration of TPH (mg/kg) <u>4280</u>
Number of soil samples exceeding 915-1 <u>39</u>	-- Highest concentration of SAR <u>2.28</u>

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 Yes

Approximate areal extent (square feet) 3150

Vertical Extent > 915-1 (in feet) 25

Groundwater

Number of groundwater samples collected 6

-- Highest concentration of Benzene (µg/l) 1390

Was extent of groundwater contaminated delineated? No

-- Highest concentration of Toluene (µg/l) 0.68

Depth to groundwater (below ground surface, in feet) 17

-- Highest concentration of Ethylbenzene (µg/l) 234

Number of groundwater monitoring wells installed 6

-- Highest concentration of Xylene (µg/l) 944

Number of groundwater samples exceeding 915-1 2

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?

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?

Based on the analytical results of the January 2024 supplemental site investigation (SSI), additional lateral delineation is required to define the extent of soil and groundwater impacts at the site. A proposed SSI map was attached to the previously submitted Form 27 (Document #404201982 In Process). During the SSI, soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the supplemental site assessment, background soil samples will be collected to assess pH, arsenic, and barium in native soil. Background samples will be analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

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.

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.

A Site Assessment was conducted between 12/15/2023 and 1/26/2024 to delineate impacted media. Eight soil borings were advanced in the area of impacts. BH01 was advanced at the same location as the waste characterization sample FS01@5' to vertically delineate impacts at that location. BH02-BH06 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at FS01@5'. Soil samples were collected and analyzed for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil, arsenic, barium, pH, SAR, EC, and boron. Six of the eight soil borings were converted to temporary groundwater monitoring wells. Six groundwater samples were collected and analyzed for BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, 1-M, 2-M, and inorganic parameters.

Based on the analytical results of the January 2024 supplemental site investigation (SSI), additional lateral delineation is required to define the extent of soil and groundwater impacts at the site. A proposed SSI map was attached to the previously submitted Form 27 (Document #404086009). During the SSI, soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the SSI, background soil samples will be collected to assess pH, arsenic, and barium in native soil. Background samples will be analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

Monitored natural attenuation is the interim remediation strategy for this location during delineation activities. The site is currently being assessed for further remedial efforts.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input type="checkbox"/> 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

Yes _____ 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.

Six groundwater monitoring wells were installed and will be sampled on a quarterly basis until four consecutive quarters of compliant groundwater results has been achieved. The groundwater samples will be collected for analysis of BTEX, naphthalene, 1,2,4-tmb, 1,3,5-tmb, 1-M, 2-M, and inorganic parameters.

Second quarter 2025 analytical results indicated that organic compound concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring well BH01R2. In addition, analytical results indicated that TDS concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring well BH06. Organic compound concentrations were in compliance of the applicable regulatory standards and inorganic parameters were within 1.25x the background concentration of the up-gradient monitoring well (BH03R) in the remaining four (4) sampled monitoring wells.

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 2Q25 Groundwater Monitoring 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 (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? 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? No

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

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. 09/08/2023

Proposed date of completion of Reclamation. 05/17/2026

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. 07/26/2022

Actual Spill or Release date, or date of discovery. 09/21/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/08/2023

Proposed site investigation commencement. 02/17/2025

Proposed completion of site investigation. 08/17/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/17/2025

Proposed date of completion of Remediation. 05/17/2026

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.

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

Basis for change in implementation schedule:

Additional lateral delineation is required to define the extent of soil and groundwater impacts at the site. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27. The ECMC will be notified in a subsequent Form 27 should the implementation schedule be updated.

The implementation schedule has not changed from the schedule proposed in previous Form 27 # 404201982, which is still pending approval as of the submission of this report.

OPERATOR COMMENT

This Form 27 is being submitted to summarize quarterly groundwater monitoring activities conducted during the second quarter of 2025 and as a 3Q25 timeline update for the completion of the proposed supplemental site investigation at the former DABNEY G-64N65W 25NENW tank battery.

Second quarter 2025 analytical results indicated that organic compound concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring well BH01R2. In addition, analytical results indicated that TDS concentrations were in exceedance of the applicable ECMC Table 915-1 regulatory standards in monitoring well BH06. Organic compound concentrations were in compliance of the applicable regulatory standards and inorganic parameters were within 1.25x the background concentration of the up-gradient monitoring well (BH03R) in the remaining four (4) sampled monitoring wells.

The implementation schedule has not changed from the schedule proposed in previous Form 27 #404201982, which is still pending approval as of the submission of this report.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation will be submitted on a subsequent Form 27.

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 Scientist

Submit Date: 08/18/2025

Email: cbarker@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: Nick Cholas

Date: 10/29/2025

Remediation Project Number: 28542

COA Type**Description**

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.
1 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**

404301413	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404301648	ANALYTICAL RESULTS
404316404	MONITORING REPORT
404413822	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)