

State of Colorado  
Energy & Carbon Management Commission

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



Document Number:  
404124069  
Receive Date:  
06/13/2025  
Report taken by:  
Abdul Elnajdi

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>(970) 313-5582</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>Jason Davidson</u>	Email: <u>jason.davidson@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30992 Initial Form 27 Document #: 403476055

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: <u>FLOWLINE</u>	Facility ID: <u>297572</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>KEHN USX AA 01-16</u>	Latitude: <u>40.510216</u>	Longitude: <u>-104.377220</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>1</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485880</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Kehn USX AA 06-16</u>	Latitude: <u>40.518783</u>	Longitude: <u>-104.388930</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>1</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications SW \_\_\_\_\_

Most Sensitive Adjacent Land Use Grassland \_\_\_\_\_

Is domestic water well within 1/4 mile? No \_\_\_\_\_

Is surface water within 1/4 mile? No \_\_\_\_\_

Is groundwater less than 20 feet below ground surface? No \_\_\_\_\_

### **Other Potential Receptors within 1/4 mile**

Pronghorn Winter Concentration Area HPH 0.17mi W  
No other potential receptors are located within ¼ mile of the Site.  
Above distances are approximations.

# 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
UNDETERMINED	GROUNDWATER	NA	Lab analysis if encountered
Yes	SOILS	Refer to Tables and Figures	Field Screening and 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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the KEHN USX AA01-16 wellhead cut and cap and flowline removal. Approximately 1109' of flowline was removed. The ECMC was updated in a supplemental Form 27 if a portion of the flowline is abandoned-in-place due to field constraints. 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. Soil samples were taken along the flowline any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. The Flowline Pre-Abandonment Notice Document number was included under Related Forms.

## 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 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, AS APPLICABLE to abandonment type. Soil samples were analyzed 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, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods. A grab confirmation soil sample was collected at the wellhead excavation in base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. The ECMC was updated with the results of the wellhead decommissioning activities on a supplemental F27.

### Proposed Groundwater Sampling

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

If groundwater is encountered during additional site assessment activities, a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters per Table 915-1.

### 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 areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The applicable ECMC Closure Checklists were utilized and filled out during the abandonment process. A photolog is attached.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 8  
Number of soil samples exceeding 915-1 3  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 300

**NA / ND**

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 2.57  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 7

**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?

\_\_\_\_\_

Were background samples collected as part of this site investigation?

Fifteen background soil samples were collected from an area not impacted by oil and gas development and at similar depths and lithologies as confirmation soil samples collected at the location and analyzed for Table 915-1 metals and SSR constituents. Background soil sample analytical results were reported with elevated levels of Arsenic (As) and Barium (Ba)

Background Soil Sample Analysis (mg/kg)  
As @ 3ft: Max\*1.25 = 2.81  
As @ 4ft: Max\*1.25 = 2.95  
Ba @ 3ft: Max\*1.25 = 55.8  
Ba @ 4ft: Max\*1.25 = 141

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?

As part of Chevron's Data Integrity Review for projects associated with Eagle Environmental, all point-of-compliance (POC) samples will be re-collected in accordance with the approved Form 27 Investigation Plan. These samples will be analyzed for the full analyte suite listed in ECMC Table 915-1.

In accordance with Document Number 403762383, elevated inorganics and metals were observed in multiple locations along the former KEHN USX AA01 -16 flowline and wellhead. Soil will be re-sampled and analyzed for the full Table 915-1 analyte suite at the FL01 3', FL06 3', and WH-FS-01@7' sample locations at the same depths where the initial elevated concentrations were observed. Noble will request that a No Further Action (NFA) determination be granted if the re-analyzed samples meet the Table 915-1 concentration standards. Background samples will be used to justify any elevated concentrations observed in the re-sampled data.

Alternatively, if the re-sample results exceed the Table 915-1 standards and cannot be attributed to native soil conditions based on background soil characterization, a minimum of five additional samples will be collected to delineate the magnitude and extent of the elevated constituents.

To support these efforts and provide further context for all sample comparisons, the Operator will collect additional local background samples from areas demonstrably unaffected by oil and gas development to further characterize native soil conditions.

Please refer to the attached Site Investigation Plan for a detailed summary of the proposed re-sample and background sample locations.

**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 organic compound exceedances observed at sample location FL05 3' were removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

## 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.

Laboratory analytical results indicated that a historical release had occurred at the location of soil sample FL05 3'. This release was reported to the Colorado Energy and Carbon Management Commission (ECMC) as a historic release under Form 19, Document Number 403648076.

The ECMC subsequently approved the Operator's request (Document Number 403648170) to apply Residential Soil Screening Levels (RSSLs) for all future sampling events. This approval was based on a static groundwater level of approximately 120 feet below ground surface (bgs), as measured in a nearby stock well (Permit #10790). The vertical separation of more than 25 feet between the groundwater table and the impacted depth at FL05 3' supports the conclusion that a viable pathway for contaminant migration to groundwater is unlikely.

To address the contamination identified at three feet bgs at FL05 3', impacted soil was excavated and removed on January 28, 2024. Upon completion of the remedial excavation, confirmation soil samples were collected and analyzed in accordance with ECMC Table 915-1 requirements for organics, metals, and soil suitability for reclamation. Analytes included Total Petroleum Hydrocarbons (TPH), BTEX, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, Polycyclic Aromatic Hydrocarbons (PAHs), pH, Sodium Adsorption Ratio (SAR), Electrical Conductivity (EC), Boron, and metals listed in Table 915-1.

Analytical results indicated that all organic constituents were below applicable RSSLs and met ECMC standards for soil suitability for reclamation. Although arsenic concentrations in all samples exceeded the RSSL, the levels are consistent with regional background concentrations and are interpreted to reflect naturally occurring conditions in native soils. Groundwater was not encountered during any phase of the remedial excavation.

## Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 30

\_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

No Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Other \_\_\_\_\_

## Groundwater Remediation Summary

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

No \_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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.

If groundwater is encountered during additional site assessment activities, a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters per Table 915-1.

# 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 Decommissioning and Remedial Excavation Data Results  
Submittal & 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 (policy 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:

No beneficial use

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 20

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: North Weld Landfill in Ault, Colorado

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?

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. 03/12/2025

Proposed date of completion of Reclamation. 06/30/2027

## 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. 07/21/2023

Actual Spill or Release date, or date of discovery. 01/08/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/21/2023

Proposed site investigation commencement. 08/20/2023

Proposed completion of site investigation. 12/31/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2024

Proposed date of completion of Remediation. 01/28/2025

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 "Proposed Date of Completion of Remediation" section has been updated to reflect the actual date of remedial excavation completion.

## OPERATOR COMMENT

This Form 27 is being submitted as a Q2 2025 timeline update for the former KEHN USX AA01-16 wellhead and flowline location, incorporating wellhead and flowline decommissioning results as well as remedial excavation outcomes.

Remedial excavation activities were completed at the impacted FL05 3' sample location on January 28, 2025. Analytical results indicated that all organic constituents and metals, with the exception of arsenic, were below the applicable Residential Soil Screening Levels (RSSLs) as approved under Document Number 403648170 (refer to Related Forms) and met ECMC standards for soil suitability for reclamation. Although arsenic concentrations in all confirmation samples exceeded the RSSL, these levels are consistent with regional background concentrations and are interpreted to reflect naturally occurring conditions in native soils. Groundwater was not encountered during any phase of the remedial excavation. Accordingly, the operator proposes to consider matters related to the impacts at the FL05 3' sample location fully remediated.

Further, the operator has not yet completed the supplemental soil resampling activities previously outlined and approved under ECMC Document Number 403762383. These activities remain a priority and are currently underway. As approved, soil resampling will be conducted at the FL01 3', FL06 3', and WH-FS-01 @7' sample locations to verify the presence or absence of elevated concentrations observed during decommissioning activities conducted in September and November 2023. Local background soil samples will also be collected during this effort to further characterize native soil conditions and support the evaluation of analytical results.

Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, the operator requested Origins Laboratory protect their laboratory analytical reports from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original reports with additional protections (Reissued Reports). The reissued reports received directly from the laboratory on 2/13/2025 (Origins) and on 3/28/2025 and 4/3/2025 (Summit) include the following verification features: the Origins report contains a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance, while the Summit reports include a Digital ID/Verified Certification (lock) to support the reissuance. The metadata associated with these Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the reports, and an explanation for the reports reissuance. The Reissued Reports are attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information.

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: Jeff Griggs

Title: Consultant

Submit Date: 06/13/2025

Email: jeffg@fremontenv.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: Abdul Elnajdi

Date: 11/04/2025

Remediation Project Number: 30992

### COA Type

### Description

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

### 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

404124069	FORM 27-SUPPLEMENTAL-SUBMITTED
404238487	ANALYTICAL RESULTS
404238488	ANALYTICAL RESULTS
404238489	SITE INVESTIGATION REPORT
404238490	SITE INVESTIGATION REPORT
404238501	REMEDICATION PROGRESS REPORT
404238502	ANALYTICAL RESULTS
404238503	ANALYTICAL RESULTS

Total Attach: 8 Files

### General Comments

**User Group**

**Comment**

**Comment Date**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
		Stamp Upon Approval

Total: 0 comment(s)