

State of Colorado
Energy & Carbon Management Commission

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404304906
Receive Date:
10/29/2025
Report taken by:
RICK ALLISON

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
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(970) 304-5000</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41669 Initial Form 27 Document #: 404241504

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>WELL</u>	Facility ID: _____	API #: <u>123-31301</u>	County Name: <u>WELD</u>
Facility Name: <u>WALCKER USX AB01-08P</u>	Latitude: <u>40.604180</u>	Longitude: <u>-104.489920</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>1</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>491087</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Walcker USX AB01-08P</u>	Latitude: <u>40.604191</u>	Longitude: <u>-104.489929</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>1</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

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 and Field Screening if encountered
Yes	SOILS	Refer to Tables and Figures	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 Walcker USX AB01-08P wellhead cut and cap and flowline removal. 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. Approximately 2035' of flowline was removed, however a portion of the flowline was abandoned-in-place due to field constraints. The ECMC will be updated in a supplemental Form 27. Soil samples were taken at the start and endpoint of the flowline where the area exists, 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.

Laboratory analytical results indicated historical releases occurred at the decommissioned wellhead and along the decommissioned flowline. Please refer to the operator comments for additional information regarding the historical release and remedial efforts to be conducted at the wellhead and flowline.

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):

A grab soil sample was collected from the area showing the highest degree of impact during field screening activities at the wellhead and flowline excavations. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Following source mass removal of hydrocarbon impacted soil, confirmation soil samples will be collected from the final extents of the excavation. Soil samples were 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 samples will be 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. All samples collected will be analyzed by a certified laboratory 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):

If groundwater is encountered during the site investigation a grab groundwater 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 areas occurred during decommissioning activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The ECMC Flowline and Wellhead 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 6
Number of soil samples exceeding 915-1 6
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 600

NA / ND

-- Highest concentration of TPH (mg/kg) 1473
-- Highest concentration of SAR 3.75
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 6

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?

Four site specific background soil samples collected from approximately 4 ft., and 6 ft-bgs from two soil borings (BKG01 through BKG02) were submitted for analysis of pH, EC, SAR, and total metals (Table 915-1 List) by ECOM approved methods.

The four background soil samples were collected from the same depths and with the same soil classification as the wellhead samples, inorganic silts/very fine sands (ML). All analytical results for soil samples submitted for analysis are compliant with their respective Table 915-1 Protection of Groundwater Soil Screening Levels or below 1.25x the highest background concentrations for arsenic (7.76 mg/kg), lead (31.0 mg/kg), and selenium (9.15 mg/kg); except for multiple organic exceedances; barium in WH01 (279 mg/kg), FLR01 (1550 mg/kg), and FL01R-W (493 mg/kg); chromium (VI) in SEP01-FL (0.56 mg/kg); copper in FLR01 (68.5 mg/kg), and zinc in FLR01 (967 mg/kg).

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?

Source mass removal of hydrocarbon impacted soil is to be conducted. Confirmation soil samples will be collected from the base and sidewalls of the final extents of the excavation and submitted for full Table 915-1 analysis.

Following source mass removal excavation activities, Noble proposes to conduct background soil sampling from boring locations at similar depths and soil horizons as excavation soil samples, in areas away from oil and gas infrastructure to further investigate residual inorganic concentrations in soil at the wellhead.

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. Any hydrocarbon impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

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.

Wellhead and flowline decommissioning activities and confirmation soil sampling at the Walcker USX AB01-08P wellhead and flowline occurred on August 4, and 13 through 14, 2025, respectively. Laboratory analytical results indicated a historical release occurred at the Walcker USX AB01-08P decommissioned wellhead and flowline and was reported as a historic release in Form 19 documents number 404304983 and 404336122. Hydrocarbon impacted material at the wellhead will be removed and hauled to a permitted disposal facility. Final analytical results will be summarized in a subsequent Supplemental Form 27 submittal and will be reported along with ongoing Remediation Project Number 41669.

Soil Remediation Summary

In Situ

Ex Situ

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

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ 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 excavation of the wellhead for decommissioning activities.

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 Historical Release Remediation Plan, SSMRP, SSIP

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? 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? No

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

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 08/04/2025

Proposed date of completion of Reclamation. 08/04/2027

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. 08/04/2025

Actual Spill or Release date, or date of discovery. 08/04/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/04/2025

Proposed site investigation commencement. 08/04/2025

Proposed completion of site investigation. 02/04/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/04/2026

Proposed date of completion of Remediation. 08/04/2026

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:

Based on the discovery of historic hydrocarbon impacts at the wellhead and flowline, source mass removal activities will be initiated as soon as possible, anticipated by the end of 1Q26. The implementation schedule has been updated to reflect these changes.

OPERATOR COMMENT

This 4Q25 Supplemental Form 27 was prepared to include the analytical results and SSMRP and SSIP for the historic releases that were discovered at the Walcker USX AB01-08P wellhead and flowline on August 4, and 13-14, 2025, respectively, and in connection with the initial Form 19 submitted under Documents 404304983 and 404336122.

Discrete soil samples were collected from beneath the wellhead, WH01, and from adjacent to the wellhead flowline riser, FLR01 and FL01R-W, from along the flowline, FL01-01 and FL01-04, and from adjacent to the separator flowline riser, SEP01-FL. All analytical results for soil samples submitted for analysis are compliant with their respective Table 915-1 Protection of Groundwater Soil Screening Levels or below the highest background concentration for pH (8.66) or 1.25x the highest background concentrations for arsenic (7.76 mg/kg), lead (31.0 mg/kg), and selenium (9.15 mg/kg); except for benzene in WH01 (0.259 mg/kg); toluene in WH01 (1.75 mg/kg); ethylbenzene in WH01 (1.83 mg/kg); 1,2,4-trimethylbenzene in WH01 (4.83 mg/kg); 1,3,5-trimethylbenzene in WH01 (1.25 mg/kg); naphthalene in WH01 (1.85 mg/kg) and SEP01-FL (0.0053 mg/kg); TPH in WH01 (1473 mg/kg) and FLR01 (1081 mg/kg); fluorene in WH01 (0.652 mg/kg); 1-methylnaphthalene in WH01 (5.16 mg/kg) and SEP01-FL (0.0087 mg/kg); 2-methylnaphthalene in WH01 (5.90 mg/kg); barium in WH01 (279 mg/kg), FLR01 (1550 mg/kg), and FL01R-W (493 mg/kg); chromium (VI) in SEP01-FL (0.56 mg/kg); copper in FLR01 (68.5 mg/kg), and zinc in FLR01 (967 mg/kg).

Background soil sample BKG01@6 laboratory analytical results for arsenic collected on 8/4/2025, was 103 mg/kg. Based on comparison of other background soil sample concentrations for arsenic collected at similar depths, the laboratory analytical result for sample BKG01@6 appears to be anomalous and therefore will not be used in calculating the maximum background concentration for arsenic.

Six site specific background samples (SB01-SB02) were collected on 8/14/2025, from approximately 2 ft., 3 ft., and 4 ft-bgs during flowline decommissioning activities. The field screening values for these background samples ranged from 0.7 to 54.3 ppm. Due to the high field screening values, these six background samples were only submitted for analysis of organic compounds in soil per ECMC Table 915-1, where no organic detections were observed as shown in Tables 2 and 3 in the attached flowline data packet. Therefore, these background samples will not be used in calculating the maximum background concentration for inorganic analytes.

Supplemental source mass removal activities will be initiated via mechanical excavation as soon as possible, anticipated by the end of 1Q26. Following source mass removal excavation activities, Noble proposes to conduct background soil sampling from boring locations at similar depths and soil horizons as excavation soil samples, in areas away from oil and gas infrastructure to further investigate residual inorganic concentrations in soil at the wellhead and flowline.

A portion of the flowline was temporarily abandoned-in-place due to that section occupying the same trench as the Walcker USX AB01-07P flowline. Flowline decommissioning activities will be completed by another Chevron business partner and will be summarized in a subsequent Supplemental Form 27 submittal. Noble will complete the decommissioning of the site infrastructure as outlined in the approved Initial Form 27 (Document Number 404241504).

The data were reviewed for compliance with the analytical method and the associated quality assurance/quality control (QA/QC) procedures. Chain of custody forms were properly executed, and data were reported using the correct methods and reporting units. The results of the QA/QC assessment indicate that data precision and accuracy are acceptable.

Pursuant to Rule 913.e, quarterly reporting will continue for the location until data indicates no further action is warranted.

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

Signed: Lindsey Blankenship

Title: Project Geologist

Submit Date: 10/29/2025

Email: chevronfr@entradainc.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: RICK ALLISON

Date: 11/06/2025

Remediation Project Number: 41669

COA Type

Description

COA Type	Description
0 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

404304906	FORM 27-SUPPLEMENTAL-SUBMITTED
404411245	SITE INVESTIGATION REPORT
404411247	ANALYTICAL RESULTS
404411250	ANALYTICAL RESULTS
404411251	ANALYTICAL RESULTS
404414562	SITE INVESTIGATION REPORT

Total Attach: 6 Files

General Comments

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

Total: 0 comment(s)