

**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:

10/30/2025

Submitted Date:

11/04/2025

Document Number:

718300096

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:

- 9 Number of Comments
- 5 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
Peterson, Dan		danpeterson@chevron.com	
Rollins, Grace		grace.rollins@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
,		rbucogccinspectionreports@chevron.onmicrosoft.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
WHITE, JEFFERY		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
490423	LOCATION	AC			-	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. Date of Inspection:10/30/2025

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

Continued under Inspector comments.

Location

Overall Good:

Signs/Marker:			
Type	BATTERY		
Comment:	Signage with emergency contact number was present on location near the location entrance (Photo 1).		
Corrective Action:		Date:	

Emergency Contact Number:		
Comment:	<input type="text"/>	
Corrective Action:	<input type="text"/>	Date: _____

Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Debris/Unused equipment was observed on location along the northern perimeter (Photo 8)		
Corrective Action:	Comply with ECMC Rules 606.a. and 606.d.	Date:	11/18/2025
Type	WEEDS		
Comment:	Weeds were observed on location around the perimeter of the tank battery (Photos 2 & 7-8).		
Corrective Action:	Comply with Rule 606.c.	Date:	11/18/2025
Type	OTHER		
Comment:	Areas of stained soil were observed throughout the former tank battery (Photos 2-7).		
Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. and comply with ECMC Rule 1002.f.(2)D. Self-inspection, maintenance, and good housekeeping procedures. These procedures shall include measures for maintaining clean, orderly operations and facilities. Note: For any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.		Date: 11/04/2025

Overall Good:

Spills:			
Type	Area	Volume	

In Containment: No _____
 Comment:
 Multiple Spills and Releases?

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

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

Facility ID: 490423 Type: LOCATION API Number: - Status: AC Insp. Status: EI

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

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: 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."

Corrective Action: A replacement Form 19 has not been received. Corrective action due date back-dated to when a replacement Form 19i was due. Date: 09/09/2025

Reportable: _____ GPS: Lat _____ Long _____
 Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)
Oily Soil			
Comment	Operator has reported that they encountered impacted soils during the decommissioning activities. These soils are required to be treated as Investigation Derived Waste in accordance with 913.b.3. and must be stored, handled, transported, treated, recycled, or disposed of in accordance with ECMC Rules. More specifically these soils are not allowed to be placed back into the excavation to prevent adverse environmental impacts.		
Corrective Action	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. Operator will return to the location immediately to remove impacted soil identified at the former produced water vessel that was used as backfill in the produced water vessel excavation. Operator shall properly dispose of oily waste in accordance with Rule 905.e. and attach all waste manifests, gate tickets/receipts to the subsequent Form 19 per Rule 905.b.(3). Additionally, Operator shall manage waste in compliance with Rule 913.b.(5) and ECMC Guidance 913.b.(5)B i-v.		Date: <u>11/05/2025</u>

Spill/Remediation:

Comment: _____
 Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____
 Comment: _____
 Pilot: _____ Wildlife Protection Devices (fired vessels): _____

ECMC Comments

Comment	User	Date
<p>Site status as of 10/30/2025:</p> <ul style="list-style-type: none"> -Signage with emergency contact number is present on location (Photo 1) -The tank battery has been decommissioned -The ~300-bbl steel crude oil AST observed on location during the previous inspection on 9/4/2025 (Doc #718300081) has been removed. -Roll-off dumpster containing flowlines and other unused equipment/debris that was observed on location during the previous inspection on 9/4/2025 (Doc #718300081) has been removed. -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 2 & 7-8). -Unused equipment was observed on location along the northern perimeter (Photo 8). -Areas of stained soil were observed throughout the former tank battery (Photos 2-7). <p>Date of Inspection: 10/30/2025 Weather: Clear, slight breeze <5mph, 50°F PPE: Level D & FR Clothing</p>	andersoln	11/04/2025

Attached Documents

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

Document Num	Description	URL
404423562	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7317366
718300097	2025_1030_Karakakes T3N-R65W-S13L01 Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7317363