

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Kilian Collins

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 ECOM 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 #: 25212 Initial Form 27 Document #: 403180731

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: 447613 | API #: _____ | County Name: WELD |
| Facility Name: LEHFELDT C 27-15,16 | Latitude: 40.279771 | Longitude: -104.527936 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SESE | Sec: 27 | Twp: 4N | Range: 64W Meridian: 6 Sensitive Area? Yes |

| | | | |
|--|---------------------|------------------------|--|
| Facility Type: SPILL OR RELEASE | Facility ID: 483621 | API #: _____ | County Name: WELD |
| Facility Name: Lehfeldt C 27-15,16 | Latitude: 40.279793 | Longitude: -104.527895 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SESE | Sec: 27 | Twp: 4N | Range: 64W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use crop _____

Is domestic water well within 1/4 mile? Yes _____

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

HPH Y-Aquatic Native Species Conservation Waters Residential 0.24 mi SE; pond ~0.19 mi SE, riverine ~0.15 mi SE and ~0.18 mi 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 | laboratory analysis if encountered |
| Yes | SOILS | 20'x15'x8' deep | laboratory 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.

A site investigation was conducted pursuant to COGCC Rule 911 at the LEHFELDT T4N-R64W-S27 L02 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, beneath the ground oil tank, and at the separator. Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. All samples collected were analyzed by a certified laboratory using approved COGCC 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 compounds per COGCC 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 tank battery area occurred during abandonment activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 5

ND Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 5

-- Highest concentration of SAR 0.831

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

BTEX > 915-1 No

Approximate areal extent (square feet) 500

Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? Yes

Highest concentration of Toluene (µg/l)

Depth to groundwater (below ground surface, in feet)

Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed

Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1

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?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soil was removed from the LEHFELDT C 27-15, 16 former produced water vault release area by excavation. The impacted soil was disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

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.

The source was excavated and confirmation soil samples were collected and analyzed for the full Table 915-1 suite of analytes from the LEHFELDT C 27-15, 16 former produced water vault release area. Groundwater was not encountered.

The laboratory analyses indicate that petroleum constituents in soil samples collected from the excavation achieved the ECMC Table 915-1 Protection of Groundwater Standards (PGSSLs) for organic petroleum constituents. However, one sample (PWV W Wall 7 Ft) exceeded the ECMC Table 915-1 PGSSLs and 125% of the maximum background concentration for cadmium and lead. All four of the excavation sidewall samples PWV N Wall 7 Ft, PWV E Wall 7 Ft, PWV S Wall 7 Ft, and PWV W Wall 7 Ft) exceeded the ECMC Table 915-1 Residential Soil Screening Levels (RSSLS) and 125% of the maximum background concentration for arsenic. One sample (PWV N Wall 7 Ft) exceeded the ECMC Table 915-1 Soil Suitability for Reclamation (SSR) concentration limit for pH. The Operator proposes to recollect samples from the four locations in the sidewalls of the excavation and submit the resamples for analysis of the full Table 915-1 analyte suite.

Should no additional active remediation be required following source removal at the location, a no further action (NFA) determination will be requested within 90 days following laboratory confirmation of the removal of impacted soils with respect to the applicable Table 915-1 screening levels at the site.

As needed, soil and/or groundwater remediation plans will be developed and submitted to ECMC in a supplemental Form 27.

Soil Remediation Summary

In Situ

Ex Situ

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

- Yes _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____ 67
- _____ 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.

REMEDATION 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 Supplemental Form 27: Produced Water Vault Excavation 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? Yes

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 67

E&P waste (solid) description hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill, Keenesburg, CO

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION 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. 12/15/2025

Proposed date of completion of Reclamation. 12/15/2027

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. 01/04/2023

Actual Spill or Release date, or date of discovery. 01/04/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/15/2022

Proposed site investigation commencement. 10/15/2022

Proposed completion of site investigation. 12/29/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/29/2023

Proposed date of completion of Remediation. 07/29/2025

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:

OPERATOR COMMENT

This form serves to comply with the Rule 913.e. reporting schedule for the Lehfeltd C27-15, 16 (Facility), REM 25212. Pending ECMC approval, the Operator will schedule and complete sample recollection in the PWV excavation sidewalls as outlined in this proposed Remedial Action workplan within the date range provided in the Remedial Action Dates section of the Implementation Schedule. Supplemental Form 27s will be prepared and submitted on a quarterly schedule to provide updates and progress of the remediation until closure criteria has been achieved.

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

Signed: Ethan Black

Title: Consultant

Submit Date: 05/30/2025

Email: ethanb@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: Kilian Collins

Date: 11/18/2025

Remediation Project Number: 25212

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**

| | |
|-----------|--------------------------------|
| 404222915 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 404222942 | OTHER |
| 404224212 | LABORATORY ANALYTICAL REPORT |

Total Attach: 3 Files

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

| | | |
|---------------|--|------------|
| Environmental | ECMC agrees with resampling of the side walls for full Table 915-1 analysis. | 11/18/2025 |
|---------------|--|------------|

Total: 1 comment(s)