

State of Colorado  
Energy & Carbon Management Commission

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404269421  
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Report taken by:  
Chris Sanchez

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 #: 31874 Initial Form 27 Document #: 403528960

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

No Multiple Facilities

Facility Type: LOCATION	Facility ID: 317656	API #: _____	County Name: WELD
Facility Name: SATER CC 18-17D TANK	Latitude: 40.316826	Longitude: -104.474900	
	** correct Lat/Long if needed: Latitude: 40.316668	Longitude: -104.475266	
QtrQtr: NENE	Sec: 18	Twp: 4N	Range: 63W 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? No  
Is groundwater less than 20 feet below ground surface? No

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

Prairie dog colony within 660ft  
NA

**SITE INVESTIGATION PLAN**

**TYPE OF WASTE:**

- E&P Waste**       **Other E&P Waste**       **Non-E&P Waste**
- Produced Water       Workover Fluids
- Oil       Tank Bottoms
- Condensate       Pigging Waste
- Drilling Fluids       Rig Wash
- Drill Cuttings       Spent Filters
- Pit Bottoms
- Other (as described by EPA)

**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Lab Analysis or 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.

A site investigation was conducted pursuant to ECMC Rule 911 at the Sater CC 18-17D facility and tank battery location on 04/08/24 and 04/09/24. Grab confirmation soil samples were collected from the base of the produced water vessel (PWV) excavation (FS01@4') and the sidewall exhibiting the highest screening level from the E wall (SS02@3'), beneath the ground oil tanks (AST01@0.5' & AST02@0.5'), and beneath the risers for the flowlines (SEP01-FL@3' & SEP02-FL@3') and dumphines (SEP01-DL@3' & SEP02-DL@3') at both separators. Field screening samples were collected from the N, E, W, & S sidewalls of the PWV excavation (SS01 - SS04), beneath both of the meter houses (MH01@0.5' & MH02@0.5'), and the flare (FLARE01@0.5').

**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 ):

Soil samples were collected as described in the Initial Action Plan section of this Form 27, in accordance with the sampling plan in the Initial Form 27. Decommissioning 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, EC, SAR, pH, metals, and boron. All samples collected were 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, samples will be collected for laboratory analysis of organic and inorganic groundwater parameters per ECMC 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 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 decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to Form 27 Document # 403745978 and 403939260.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 9

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 100

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_

-- Highest concentration of SAR 1.71

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?

On 4/9/2024, three background soil samples were collected from one discrete location (BG01) during decommissioning of the Sater CC 18-17D Facility and analyzed for metals in soil per ECMC Table 915-1 and pH. During site investigation activities on 5/1/2025, 10 additional background soil samples were collected from 5 discrete locations (BKG02-BKG06) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging from 0.5 to 7 feet below ground surface. The maximum background pH was observed to be 8.71. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, and selenium were calculated to be 3.9 mg/kg, 218 mg/kg, 0.35 mg/kg, and 5.4 mg/kg, respectively. All arsenic and selenium concentrations observed during decommissioning and site investigation activities were below 1.25x the maximum background level.

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?

A review of background data adjacent to the Sater CC18-17D Facility is in process. The next Form 27 submission will include a background analysis and site investigation activity proposal as necessary.

## 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.

No impacted material caused by oil and gas operations was identified at this time.

### REMEDATION 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 on 5/1/2025 to delineate impacted media, during which 5 soil borings were advanced to 7 feet below ground surface. BH01 was advanced at the same location as soil sample FS01@4' to vertically delineate impacts at that location. BH02-BH05 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at FS01@4'. Soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Groundwater was not encountered during this assessment.

Analytical results from the May 2025 site assessment indicate that the impacts at FS01 were fully delineated. Barium and cadmium exceedances were observed at sample location BH04@6-7'.

A review of background data adjacent to the Sater CC18-17D Facility is in process. The next Form 27 submission will include a background analysis and site investigation activity proposal as necessary.

### **Soil Remediation Summary**

**In Situ**

**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

\_\_\_\_\_ 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 initial decommissioning or site investigation 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 Site Investigation 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 15 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? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

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. 04/08/2024

Proposed date of completion of Reclamation. 01/22/2026

## 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. 08/31/2023

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/08/2024

Proposed site investigation commencement. 07/11/2025

Proposed completion of site investigation. 10/11/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/11/2025

Proposed date of completion of Remediation. 10/11/2026

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:

The implementation schedule has been changed due to the completion of the May 2025 supplemental site investigation (SSI) at the Sater CC 18-17D tank battery and necessity for additional activities adjacent to the tank battery. A proposal for additional site investigation activities will be included on a subsequent Form 27.

## OPERATOR COMMENT

This Form 27 is being submitted to include the supplemental site investigation (SSI) results at the Sater CC 18-17D Tank Battery (Rem # 31874).

A site assessment was conducted on 5/1/2025 to delineate impacted media, during which 5 soil borings were advanced to 7 feet below ground surface. BH01 was advanced at the same location as soil sample FS01@4' to vertically delineate impacts at that location. BH02-BH05 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at FS01@4'. Soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Groundwater was not encountered during this assessment. Analytical results from the May 2025 site assessment indicate that the impacts at FS01 were fully delineated. Barium and cadmium exceedances were observed at sample location BH04@6-7'.

On 4/9/2024, three background soil samples were collected from one discrete location (BG01) during decommissioning of the Sater CC18-17D Tank Battery and analyzed for metals in soil per ECMC Table 915-1 and pH. During site investigation activities on 5/1/2025, 10 additional background soil samples were collected from 5 discrete locations (BKG02-BKG06) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging from 0.5 to 7 feet below ground surface. The maximum background pH was observed to be 8.71. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, and selenium were calculated to be 3.9 mg/kg, 218 mg/kg, 0.35 mg/kg, and 5.4 mg/kg, respectively. All arsenic and selenium concentrations observed during decommissioning and site investigation activities were below 1.25x the maximum background level.

A review of background data adjacent to the Sater CC18-17D Tank Battery is in process. The next Form 27 submission will include a background analysis and site investigation activity proposal as necessary.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project.

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

Signed: McKenzie Reynolds

Title: Environmental Technician

Submit Date: 07/30/2025

Email: mreynolds@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: Chris Sanchez

Date: 11/24/2025

Remediation Project Number: 31874

## COA Type

## Description

	Operator shall continue Quarterly Reporting until the Site Assessment is completed, and the remediation area demonstrates Compliance with Full Table 915-1 Standards.
	All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
	If Operator requests to use off location background samples Operator shall provide a NRCS map showing all sample points, the distance from the site that the background samples were taken, soil type, and a confirmation of same land use. Operator shall also provide original laboratory analytical.
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
4 COAs	

## 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

404269421	FORM 27-SUPPLEMENTAL-SUBMITTED
404275241	LABORATORY ANALYTICAL REPORT
404276329	SITE INVESTIGATION REPORT

Total Attach: 3 Files

## General Comments

## User Group

## Comment

## Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)