

State of Colorado
Energy & Carbon Management Commission

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404403626
Receive Date:
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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: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 304-5000
City: DENVER	State: CO	Zip: 80202
Contact Person: Dan Peterson	Email: RBUEUF27@chevron.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39119 Initial Form 27 Document #: 404069226

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: 481565	API #: _____	County Name: WELD
Facility Name: NENE 15-6N-64W Speicher TB Loc	Latitude: 40.492155	Longitude: -104.527082	
** correct Lat/Long if needed: Latitude: 40.492329		Longitude: -104.527126	
QtrQtr: NENE	Sec: 15	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 491963	API #: _____	County Name: WELD
Facility Name: NENE 15-6N-64W Speicher	Latitude: 40.492451	Longitude: -104.527179	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 15	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Cropland

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

Within Mule Deer Severe Winter Range HPH
Pronghorn Winter Concentration Area HPH 0.04mi E
Freshwater Emergent Wetland 0.01mi N
Freshwater Pond 0.01/0.03mi N, 0.19mi NW, 0.21/0.24mi E, 0.24mi SE, 0.25mi W
Residential 0.16mi NW, 0.13/0.15/0.16/0.18mi S
Farm Structure 0.05/0.07/0.1/0.15/0.19mi E, 0.05mi NE, 0.15/0.16mi NW, 0.07/0.1/0.16/0.17mi S, 0.07/0.11/0.15/0.16/0.18/0.2mi SE

DENIED

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 during decommissioning activities at NENE 15-6N-64W Speicher TB Loc. The facility was decommissioned on 05/13/25. Laboratory confirmation soil samples were collected from the produced water vessel (PWV) excavation base (PWV01-B) and field screening samples were taken from the N, W, S, & E sidewalls. The screening sample with the highest screening level (PWV01-N) was collected for laboratory analysis from the N sidewall. Laboratory soil samples were also collected from beneath the above-ground storage tank (AST01), and beneath the flowline and dumphine risers of the separator (SEP01-FL, SEP01-DL). Field screening samples were collected beneath the meter house (MH01) and emission control device (FLARE01). The on-site dump lines located between the separator and tank battery were removed by pulling from either end.

Laboratory results indicated that organic constituents naphthalene and benzo(a)anthracene was detected in exceedance of ECMC Table 915-1 regulation within sample SEP01-FL, and was reported as a historic reportable release in Form 19 # 404244652 (Spill ID 491963). Soil that was potentially saturated with groundwater was encountered in the base of the PWV excavation during decommissioning activities. Soil samples were noted to be outside temperature range upon laboratory receipt; therefore, all laboratory-submitted decommissioning samples will be re-collected.

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):

Sampling was conducted as described in the Initial Action Summary of this Form 27, per the approved sampling plan in Initial Form 27 # 404069226.

Confirmation soil samples were analyzed by a certified laboratory for the full extent of Table 915-1. To ensure proper lab preservation of soil samples, they will be re-collected and analyzed 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.

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 at the tank battery area occurred during tank battery decommissioning activities. Personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to Form 27 # 404243565.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 200

NA / ND

-- Highest concentration of TPH (mg/kg) 68
-- Highest concentration of SAR 6.86
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

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 05/13/25, 3 background soil samples were collected from one discrete location (BKG01) adjacent to the tank battery at depths ranging between 0 and 5 feet below ground surface (ft bgs) and analyzed for metals in soil per ECMC Table 915-1, pH, EC, SAR, and boron. Background soil sample BKG01 @5' analytical results for barium are considered anomalous, and will be omitted from background calculations. The maximum background concentration for EC and SAR were 4.52 mmhos/cm and 9.13, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, hexavalent chromium, and selenium were calculated to be 4.5 mg/kg, 73.4 mg/kg, 0.60 mg/kg, and 3.4 mg/kg, respectively. All SAR concentrations observed during decommissioning were below background levels. All arsenic, hexavalent chromium, and selenium concentrations observed during decommissioning 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 supplemental site investigation (SSI) will be completed to recollect decommissioning soil samples, delineate organic exceedances observed during decommissioning, collect a groundwater sample, and collect additional background samples.

Soil samples were noted to be outside temperature range upon laboratory receipt; therefore, all lab-submitted decommissioning soil samples will be recollected. To address the naphthalene and benzo(a)anthracene exceedances observed at SEP01-FL during decommissioning, soil borings BH01-BH05 will be advanced to obtain vertical and horizontal delineation. Additional soil boring BH06 will be advanced in the vicinity of the observed groundwater in the produced water vessel excavation and converted into a temporary groundwater monitoring well to collect a sample. Soil and groundwater samples will be collected and analyzed for full ECMC Table 915-1 constituents. Additional background samples BKG02-BKG06 will be collected and analyzed for metals in soil per ECMC Table 915-1, pH, EC, SAR and boron.

Proposed soil boring locations are shown on the proposed site investigation map attached to this Form 27. This SSI proposal replaces that which was submitted on previous Form 27 # 404243565 (which is pending approval at the time of this form's submission). The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

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.

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.

A supplemental site investigation (SSI) will be completed to recollect decommissioning soil samples, delineate organic exceedances observed during decommissioning, collect a groundwater sample, and collect additional background samples.

Soil samples were noted to be outside temperature range upon laboratory receipt; therefore, all lab-submitted decommissioning soil samples will be recollected. To address the naphthalene and benzo(a)anthracene exceedances observed at SEP01-FL during decommissioning, soil borings BH01-BH05 will be advanced to obtain vertical and horizontal delineation. Additional soil boring BH06 will be advanced in the vicinity of the observed groundwater in the produced water vessel excavation and converted into a temporary groundwater monitoring well to collect a sample.

Sampling will be conducted in accordance with the attached proposed site investigation map, and proposed sampling plan outlined in the Site Investigation Report section of this Form 27. This SSI proposal replaces that which was submitted on previous Form 27 # 404243565 (pending approval at the time of this form's submission).

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.

Soil that was potentially saturated with groundwater was encountered during initial site decommissioning activities in the base of the produced water vessel excavation at approximately 5 feet below ground surface. A groundwater sample was not able to be collected during initial decommissioning activities. One soil boring (BH06) will be advanced in the vicinity of the observed groundwater in the produced water vessel excavation and converted into a temporary groundwater monitoring well to collect a sample.

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 Proposal

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? _____

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 reseeded 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. 05/13/2025

Proposed date of completion of Reclamation. 09/18/2027

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. 01/14/2025

Actual Spill or Release date, or date of discovery. 06/16/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/13/2025

Proposed site investigation commencement. 03/18/2026

Proposed completion of site investigation. 03/18/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/18/2026

Proposed date of completion of Remediation. 03/18/2027

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 not changed from the schedule proposed in previous Form 27 # 404243565, which is still pending approval as of the submission of this report. The updated proposed site investigation is tentatively scheduled for 03/18/26. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

OPERATOR COMMENT

This Form 27 is being submitted to include an updated site investigation proposal for the NENE 15-6N-64W Speicher TB Loc (Rem # 39119).

A supplemental site investigation (SSI) will be completed to recollect decommissioning soil samples, delineate organic exceedances observed during decommissioning, collect a groundwater sample, and collect additional background samples.

Soil samples were noted to be outside temperature range upon laboratory receipt; therefore, all lab-submitted decommissioning soil samples will be recollected and analyzed for full ECMC Table 915-1 constituents. To address the naphthalene and benzo(a)anthracene exceedances observed at SEP01-FL during decommissioning, soil borings BH01-BH05 will be advanced to obtain vertical and horizontal delineation. Additional soil boring BH06 will be advanced in the vicinity of the observed groundwater in the produced water vessel excavation and converted into a temporary groundwater monitoring well to collect a groundwater sample. All soil and groundwater samples will be collected and analyzed for full ECMC Table 915-1 constituents. Additional background samples BKG02-BKG06 will be collected and analyzed for metals in soil per ECMC Table 915-1, pH, EC, SAR and boron.

Proposed soil boring locations are shown on the proposed site investigation map attached to this Form 27. The SSI is tentatively scheduled for 3/18/2026. This SSI proposal replaces that which was submitted on previous Form 27 # 404243565, which is pending approval at the time of this form's submission.

Laboratory analytical report DA72330 was reissued from the lab on 10/21/2025 to update selenium reporting limits; subsequently, selenium results were updated. Selenium analyses now exceed hold time criteria; therefore, reanalysis is required and results from this report will not be utilized. Additional samples will be taken and analyzed for full Table 915-1 constituents. The revised report is attached to this Form 27 for transparency.

The results of the SSI will be submitted on a subsequent Form 27. Per ECMC 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: Julia Gustafson

Title: Environmental Technician

Submit Date: 11/21/2025

Email: tas-chevron-5@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: _____

Date: _____

Remediation Project Number: 39119

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

404403626	FORM 27 DENIED
404445918	SITE INVESTIGATION PLAN
404450073	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

Environmental	Rule 912.a.(2) and Rule 913.d.(1) requires that Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Rule 913.b.(2) is clear on the requirements for Operators to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1.	11/25/2025
Environmental	ECMC has denied this form as the analytical discussed in the Operator comments and referenced in the attached map have not been provided to date.	11/25/2025

Total: 2 comment(s)