

State of Colorado
Energy & Carbon Management Commission

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Receive Date:

Report taken by:

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 #: 21028 Initial Form 27 Document #: 402880391

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: <u>WELL</u>	Facility ID: _____	API #: <u>123-30418</u>	County Name: <u>WELD</u>
Facility Name: <u>WCL 24-5</u>	Latitude: <u>40.344638</u>	Longitude: <u>-104.682315</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>5</u>	Twtp: <u>4N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Crop Land

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

The South Branch Union Ditch is located 0.1 miles south, and the Union ditch is located 0.18 miles west of the Location. A freshwater emergent wetland is located 0.2 miles west and a freshwater pond is located 0.25 miles west of the Location. Residential structures are located 0.18 and 0.21 miles east of the Location.

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	Field-Screening and Laboratory Analysis, if Encountered
Yes	SOILS	Refer to Tables and Figures	Field-Screening and 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.

Pursuant to Colorado Energy & Carbon Management Commission (ECMC) Rule 911, a site investigation was conducted by a previous consultant pertaining to the WCL #24-5 wellhead cut and cap and temporary flowline abandonment. On June 6, 2024, initial wellhead characterization sampling was completed and two samples were collected: one from the wellhead excavation base (WH01) and one from the western sidewall (FLR01), representing the flowline connection to the riser. Samples were submitted for analysis of all ECMC Table 915-1 constituents; results were compliant except for pH and arsenic. On June 17, 2024, initial flowline characterization sampling was completed. Two soil samples were collected: one from the flowline connection to the wellhead (FL01R-S) and one at the connection point to the separator (FL01R-W). Samples were submitted for analysis of all ECMC Table 915-1 constituents; results were compliant except for pH, arsenic, and barium. Two background soil samples were collected and submitted for analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), and Table 915-1 metals. See Document 404007491 details.

On January 24, 2025, additional background samples were collected by a previous consultant and submitted for analysis of Table 915-1 inorganics (Soil Suitability for Reclamation [SSR] and metal constituents). See Document 404007491, the attached supplemental soil sample location map, and the attached laboratory results for details.

Continued in Remediation Summary section....

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):

In response to ECMC's Condition of Approval (COA) in Form 27 dated October 30, 2024 (Document 403864622), stating that the laboratory analytical report indicated soil samples were delivered to the laboratory outside of the required temperature preservation range, Confluence Compliance Companies, LLC (Confluence) completed recharacterization of initial sample FLR01@4 on November 13, 2025, as it was not included in the May 21, 2025 event. Additionally, field-screening samples were collected along the abandoned flowline and three background samples were collected to further characterize native inorganics in the project area. The recharacterization sample (FLR01@5) was submitted for analysis of all Table 915-1 constituents and the background samples were submitted for Table 915-1 inorganics; laboratory results are pending and will be reported in a subsequent Form 27.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

No groundwater has been encountered during site investigation activities. If groundwater is encountered, a grab groundwater sample will be collected and analyzed for full 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 wellhead and flowline areas occurred during site investigation activities. Field personnel assessed all disturbed areas for indications of past spills, such as staining or salt accumulation, with direction to collect samples and report any areas of concern. No areas of concern have been reported.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 1

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 1.65

BTEX > 915-1 No

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?

On June 17, 2024, and January 24, 2025, a total of seven background soil samples were collected and submitted for analysis of Table 915-1 inorganics (excluding boron in the 2024 samples). Laboratory results of background samples indicate maximum values of pH, arsenic, and barium of 8.41, 2.41 milligrams per kilogram (mg/kg), and 93.9 mg/kg, respectively. See Document 404007491, the attached soil sample location map, and the attached laboratory results for details.

On November 13, 2025, Confluence collected three additional background samples to further characterize native values of inorganics in the project area; laboratory results are pending and will be submitted in a subsequent Form 27.

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?

Laboratory results from the November 13, 2025, supplemental site investigation (SSI) are pending and will be reported in a subsequent Form 27. Should the SSI indicate the need for further remedial activities, a schedule will be provided.

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 soil exceedances resulting from oil and gas operations have been identified. Should impacted material be identified at any point during the site investigation, a removal summary will be provided.

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.

No soil exceedances resulting from oil and gas operations have been identified with this project. Should impacted material be identified at any point during site investigation efforts, a remedial investigation will be undertaken, and a summary of those efforts will be provided.

Continued from Initial Action Summary Section....

In response to ECMC's COA in Form 27 dated October 30, 2024 (Document 403864622), stating that the laboratory analytical report indicated soil samples were delivered to the laboratory outside of the required temperature preservation range, WH01 was resampled by a previous consultant May 21, 2025. However, FLR01@4' was not recharacterized from the initial out of temp sampling event. The sample was collected 6.5 feet below ground surface (bgs) and submitted for analysis of all ECMC Table 915-1 constituents. Laboratory results indicated full compliance except for arsenic. See Document 404324977 (In Process) for details.

On November 13, 2025, Confluence Compliance Companies, LLC (Confluence) completed recharacterization of initial out of temp sample FLR01@4', collected field-screening samples along the abandoned flowline, and collected three additional background samples. The recharacterization sample (FLR01@5') was submitted for analysis of all Table 915-1 constituents and the background samples were submitted for Table 915-1 inorganics; laboratory results are pending and will be reported in a subsequent Form 27.

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 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 Quarterly Update

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 reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be carried out 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. 10/31/2026

Proposed date of completion of Reclamation. 10/31/2028

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. 09/09/2021

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/06/2024

Proposed site investigation commencement. 01/24/2025

Proposed completion of site investigation. 11/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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 adjusted to reflect the status of site investigation efforts and anticipated dates for completion. On November 13, 2025, a supplemental site investigation (SSI) was completed at the Location. A recharacterization sample was collected at FLR01@5' and submitted for full Table 915-1 laboratory analysis. Three background samples were collected from nearby, native, and undisturbed areas and submitted for analysis of Table 915-1 inorganics. Results from this investigation are pending and will be reported in a subsequent Form 27. Remediation dates have been removed from this submittal as no active remediation is planned at this time. Should the SSI indicate the need for remedial activities, a schedule will be provided.

OPERATOR COMMENT

This form has been submitted to satisfy the quarterly reporting schedule for the WCL #24-5 (Remediation Project 21028). In response to ECMC's COA in Form 27 dated October 30, 2024 (Document 403864622), stating that the laboratory analytical report indicated soil samples were delivered to the laboratory outside of the required temperature preservation range, Confluence completed recharacterization of initial sample FLR01@4 on November 13, 2025. Additionally, field-screening samples were collected along the abandoned flowline corridor and three background samples were collected to further characterize native inorganics in the project area. The recharacterization sample (FLR01@5) was submitted for analysis of all Table 915-1 constituents and the background samples were submitted for Table 915-1 inorganics. Laboratory results are pending and will be reported in a subsequent Form 27, please see Sample Login Receipts attached to this Form 27.

On January 24, 2025, background samples were collected by a previous consultant and submitted for analysis of Table 915-1 inorganics (Soil Suitability for Reclamation [SSR] and metal constituents), however results from this effort were never reported. See Document 404007491, the attached soil sample location map, and the attached laboratory results for details.

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: Vincent Sepe

Title: Project Manager

Submit Date: _____

Email: CVX-REMS@confluence-cc.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: 21028

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**

404441742	LABORATORY ANALYTICAL REPORT
404441748	OTHER
404441749	OTHER
404448860	ANALYTICAL DATA SUMMARY TABLE(S)
404453054	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)