

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
404459234

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>Dan Peterson</u>	Email: <u>rbueuf27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28380 Initial Form 27 Document #: 403340587

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: <u>LOCATION</u>	Facility ID: <u>332721</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>CORNELIUS-63N65W 11SWNW</u>	Latitude: <u>40.244667</u>	Longitude: <u>-104.637442</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>11</u>	Twp: <u>3N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>484505</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>CORNELIUS-63N65W 11SWNW</u>	Latitude: <u>40.243611</u>	Longitude: <u>-104.637095</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>11</u>	Twp: <u>3N</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 Rangeland _____

Is domestic water well within 1/4 mile? No _____

Is surface water within 1/4 mile? Yes _____

Is groundwater less than 20 feet below ground surface? Yes _____

Other Potential Receptors within 1/4 mile

Bald Eagle Roost Site
Emergent Wetlands 140ft SE, 115ft E, Riverine Wetlands (Gilmore Ditch) 0.10mi E, Freshwater Pond 0.08mi W, 0.12mi E
No other potential receptors are located within ¼ mile of the Site.

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
Yes	GROUNDWATER	See tables and figures	Lab analysis and field screening
Yes	SOILS	45'x55'x8' deep	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 CORNELIUS T3N-R65W-S11 L01 Facility and 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(s) excavation, beneath the ground oil tank(s), and at the risers for the flowline(s) and dumpline(s) of any separator(s). Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, and boron. All samples collected will be 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):

Groundwater was encountered during the site investigation and a grab groundwater was collected and analyzed for all organic compounds 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 of the tank battery area will occur during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>10</u>	-- Highest concentration of TPH (mg/kg) <u>239</u>
Number of soil samples exceeding 915-1 <u>6</u>	-- Highest concentration of SAR <u>3.62</u>

Was the areal and vertical extent of soil contamination delineated? Yes _____

BTEX > 915-1 No _____

Approximate areal extent (square feet) 2500 _____

Vertical Extent > 915-1 (in feet) 10 _____

Groundwater

Number of groundwater samples collected 5 _____

ND Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No _____

ND Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) 6 _____

-- Highest concentration of Ethylbenzene (µg/l) 11.2 _____

Number of groundwater monitoring wells installed 5 _____

-- Highest concentration of Xylene (µg/l) 19.2 _____

Number of groundwater samples exceeding 915-1 1 _____

NA 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?

Ten background soil samples were collected from an area not impacted by oil and gas development and at similar depths and lithologies as confirmation soil samples collected at the location and analyzed for Table 915 metals and soil suitability for reclamation constituents. Background soil sample analytical results were reported with elevated levels of arsenic, barium, chromium (VI), pH, boron, and SAR.

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?

Refer to the Remedial Action Plan section of this report.

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 will be removed from the release area by excavation. The impacted soil will be disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests will be 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.

Excavation to remove soil impacts at and adjacent to the former produced water vault began on October 13, 2025 and was completed on November 11, 2025. All five monitoring wells were destroyed during the excavation and will be replaced. Details of the excavation results will be submitted on the next Form 27.

Following source removal of soil at the location, monitoring wells will be reinstalled and a no further action (NFA) determination will be requested once four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents, detailed in the Groundwater Monitoring section, below regulatory limits. 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)

_____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

_____ 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

Yes _____ 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.

Noble Energy, Inc. installed soil borings that were improved with temporary PVC monitoring wells on 5/21/2025. Quarterly groundwater monitoring will be completed until four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents below regulatory limits. Groundwater monitoring wells are sampled and submitted to a laboratory for analysis of Table 915-1 groundwater constituents: Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene (TMB), 1,3,5-TMB, 1- Methyl-naphthalene, 2-Methyl-naphthalene Chloride ion, Sulfate ion and Total Dissolved Solids (TDS).

Third quarter 2025 groundwater sampling was completed at the location on August 11, 2025. MW-1, MW-2, MW-3, MW-4, and MW-5 were sampled.

The laboratory results indicate that Table 915-1 dissolved phase organic constituents were compliant with their respective standards in four of the five wells. One monitoring well (MW-3) was reported with concentrations exceeding the ECMC Table 915-1 1,2,4 TMB standard. Further, the analytical results indicate that Table 915-1 inorganic constituents, TDS, chloride, and sulfate comply with their respective standards and/or background concentrations in all five wells sampled. MW-5 is the furthest upgradient well and has been temporarily selected for background comparison. One monitoring well will be installed in native soil, undisturbed by oil and gas activity, upgradient of the former tank battery, to provide a representative characterization of native groundwater conditions to be used for background comparison.

An eastern point of compliance (POC) has not been established since the wells were installed in May 2025. Two wells are proposed to be installed to the east of MW-3 to provide additional delineation of the impacted extent of groundwater and attempt to establish POC on site to the east.

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 _____

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? No _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

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. 12/31/2025

Proposed date of completion of Reclamation. 12/31/2027

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. 03/02/2023

Actual Spill or Release date, or date of discovery. 05/17/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/20/2023

Proposed site investigation commencement. 05/02/2023

Proposed completion of site investigation. 12/30/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2024

Proposed date of completion of Remediation. 12/31/2026

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 need to reinstall monitoring wells destroyed by excavation, and add a background monitoring well and POC monitoring wells, and monitor groundwater conditions for a minimum of four consecutive quarters at the Cornelius 63N65W 11SWNW former Tank Battery. The proposed well installation will be completed following the approval of this form.

OPERATOR COMMENT

This Form 27 is being submitted to include quarterly groundwater monitoring results for the former Cornelius 63N65W 11SWNW tank battery location.

Third quarter 2025 groundwater was completed at the location on August 11, 2025. MW-1 through MW-5 were sampled and submitted to PACE Analytical Laboratory for analysis benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5 TMB by EPA method 8260B, semi volatile organic compounds by EPA Method 8270E-SIM, chloride & sulfate ion by EPA Method 9056A and total dissolved solids (TDS) by EPA Method 2540 C-2011.

The laboratory results indicate that Table 915-1 dissolved phase organic constituents were compliant with their respective standards in four of the five wells. One monitoring well (MW-3) was reported with concentrations exceeding the ECMC Table 915-1 1,2,4 TMB standard. Further, the analytical results indicate that Table 915-1 inorganic constituents, TDS, chloride, and sulfate comply with their respective standards and/or background concentrations in all five wells sampled. MW-5 is the furthest upgradient well and has been temporarily selected for background comparison. One monitoring well will be installed in native soil, undisturbed by oil and gas activity, upgradient of the former tank battery, to provide a representative characterization of native groundwater conditions to be used for background comparison.

An eastern point of compliance (POC) has not been established since the wells were installed in May 2025. Two wells are proposed to be installed to the east of MW-3 to provide additional delineation of the impacted extent of groundwater and attempt to establish POC on site to the east. Based on the May 2025 data, groundwater flows from west to east at the site.

Excavation to remove soil impacts at and adjacent to the former produced water vault began on October 13, 2025 and was completed on November 11, 2025. All five monitoring wells were destroyed during the excavation and will be replaced. Details of the excavation results will be submitted on the next Form 27.

NFA is estimated to be attained by December 31, 2026.

Pursuant to Rule 913.e, quarterly reporting will continue for the location until data indicates no further action is warranted.

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: _____

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: _____

Date: _____

Remediation Project Number: 28380

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

404460920	LABORATORY ANALYTICAL REPORT
404462754	MONITORING REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)