

State of Colorado
Energy & Carbon Management Commission

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Receive Date:
04/10/2025

Report taken by:
Laurel Anderson

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
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 730-7281
City: DENVER State: CO Zip: 80202		Mobile: ()
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25142 Initial Form 27 Document #: 403169054

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: 327389	API #: _____	County Name: WELD
Facility Name: UPRR 53 PAN AM UT/T/-63N65W 25SENW	Latitude: 40.199617	Longitude: -104.615717	
** correct Lat/Long if needed: Latitude: 40.199146		Longitude: -104.616033	
QtrQtr: SENW	Sec: 25	Twp: 3N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 488386	API #: _____	County Name: WELD
Facility Name: Dechant 21-25	Latitude: 40.199219	Longitude: -104.615683	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 25	Twp: 3N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Grassland

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 Burrowing Owl Active Nest Site
Riverine 0.03mi W, 0.08mi SW, 0.04mi N
Industrial 0.25mi E

DENIED

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	Lab Analysis if encountered
Yes	SOILS	Refer to Tables & 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 DECHANT COHN CROWE UPRR T3N-R65W-S25 L01 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 tanks, and at the separators. 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 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 it encountered during the site investigation, grab groundwater samples will be collected and analyzed for all organic and inorganic 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 at the tank battery area occurred during abandonment activities. Field personnel will 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, figures, and laboratory analytical results, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 45
 Number of soil samples exceeding 915-1 22

NA / ND

-- Highest concentration of TPH (mg/kg) 2860
 -- Highest concentration of SAR 5.38

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

BTEX > 915-1 No

Approximate areal extent (square feet) 2500

Vertical Extent > 915-1 (in feet) 10

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?

Twenty-seven background soil samples were collected from ten boreholes (BG02 - BG11) near the tank battery and analyzed for metals in soil per ECMC Table 915-1, twenty background soil samples were analyzed for pH, EC, SAR, and boron. Background soil samples were collected from depths ranging between 0.5 to 5 feet below ground surface (ft bgs) and the lithology between the site and background locations were observed to be silty sands. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, chromium (VI), and lead were calculated to be 28.8 mg/kg, 171 mg/kg, 0.38 mg/kg, and 23.5 mg/kg, respectively. All arsenic, barium, chromium (VI), and lead concentrations observed during decommissioning and supplemental site investigation (SSI) activities were below background levels.

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?

Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, additional background soil samples will be collected to confirm that arsenic, barium, chromium, and lead are attributed to native soil conditions at the site.

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.

The organic compound exceedances observed at sample locations BH04R@0.5' and BH07@5.5' will be removed through a remedial excavation.

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 Site Assessment was conducted on 10/21/2024 to delineate impacted media, during which nine soil borings were advanced. BH01R-BH05R were advanced to resample BH01-BH05 and confirm metals exceedances at the tank battery location. BH07-BH09 were advanced surrounding BH01R-BH05R to further vertically and laterally delineate the exceedances observed at BH01-BH05. Soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Groundwater was not encountered during this assessment. During the SSI, elevated PIDs and hydrocarbon staining and odor were encountered at soil boring BH07. Following the receipt of preliminary analytical results on 10/22/2024, a historic release was reported to the ECMC. Final analytical results indicated that organic impacts were observed in soil samples BH04R@0.5' and BH07@5.5'.

Based on the analytical results and site investigation observations, Chevron is proposing to conduct remedial excavation activities to remove remaining hydrocarbon impacts identified in initial decommissioning and site investigation activities. Following excavation activities, confirmation soil samples will be collected from the final excavation extent and submitted for laboratory analysis for full ECMC Table 915-1 constituents.

Soil Remediation Summary

In Situ

Ex Situ

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

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ 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 during 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 Confirmation Sample Summary, Supplemental Source Mass Removal 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 (policy MWZZ 316714) 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 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. 01/06/2023

Proposed date of completion of Reclamation. 08/05/2026

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. 07/26/2022

Actual Spill or Release date, or date of discovery. 10/22/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/06/2023

Proposed site investigation commencement. 04/08/2025

Proposed completion of site investigation. 10/08/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/08/2025

Proposed date of completion of Remediation. 04/08/2026

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 October 2024 supplemental site investigation (SSI) at the Dechant D21-25 tank battery and necessity for remedial excavation activities adjacent to the tank battery. The proposed remedial excavation will be completed following the approval of this form.

OPERATOR COMMENT

On October 21, 2024, a supplemental site investigation was conducted to delineate hydrocarbon impacts recorded during initial decommissioning activities and evaluate native soil concentrations for arsenic, barium, chromium (VI), and lead. Based on the preliminary results, Chevron is proposing to conduct a remedial excavation to remove the the organic impacts identified during decommissioning and site investigation activities (soil samples BH04R@0.5' and BH07@5.5') is presented in the Remedial Action Plan section of this Form 27.

Twenty-seven background soil samples were collected near the tank battery and analyzed for metals in soil per ECMC Table 915-1, twenty of these were analyzed for pH, EC, SAR, and boron. Background soil samples were collected from depths ranging between 0.5 to 5 feet below ground surface (ft bgs) and the lithology between the site and background locations were observed to be silty sands. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, chromium, and lead were calculated to be 28.8 mg/kg, 171 mg/kg, 0.38 mg/kg, and 23.5 mg/kg, respectively. All arsenic, barium, chromium, and lead concentrations observed during decommissioning and supplemental site investigation (SSI) activities were below background levels.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the remedial excavation will be submitted on a subsequent Form 27.

During the SSI completed on 10/21/2024, elevated PIDs and hydrocarbon staining and odor were encountered at soil boring BH07. Following the receipt of preliminary analytical results on 10/22/2024, a historic release was reported to the ECMC. Final analytical results indicated that organic impacts were observed in soil samples BH04R@0.5' and BH07@5.5'. Based on the analytical results and site investigation observations, Chevron is proposing to conduct remedial excavation activities to remove remaining hydrocarbon impacts identified in initial decommissioning and site investigation activities.

In response to ECMC Form 27 Comments dated 12/24/2024 and 4/01/2025, (Document Numbers 403930894, 403965941, and 404138053), Operator is submitting a replacement Form 27. Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical reports from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original reports with additional protections (Reissued Report). The Reissued Reports were received directly from the lab (Origins) on 4/1/2025 and include a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance. Additionally, a Reissued Report was received directly from the lab (Summit Scientific) on 4/8/2025, which includes the application of a Digital ID/Verified Certification (lock) to support reissuance. The metadata associated with this Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Report is attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information responsive to ECMC's general comments responding to Operator's Form 27 submission found in Document Number 403930894, 403965941, and 404138053.

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

Signed: Ben Wagner

Title: Environmental Consultant

Submit Date: 04/10/2025

Email: tas-chevron-4@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: 25142

COA Type

Description

0 COA	
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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
404045767	FORM 27-SUPPLEMENTAL-SUBMITTED
404156786	ANALYTICAL RESULTS
404156862	MONITORING REPORT
404156920	ANALYTICAL RESULTS
404156921	ANALYTICAL RESULTS
404156922	ANALYTICAL RESULTS

Total Attach: 6 Files

General Comments

User Group	Comment	Comment Date
Environmental	ECMC has denied the subject form for the following reasons: The subject Form is not	12/08/2025

reflective of the current status of this Remediation Project; information previously reported under Denied Form 27s (Doc Nos 403930894, 404138053 & 403965941) has been omitted. Attachments include multiple discrepancies. Additionally, no justification was given for the delay to complete the additional site investigation and remediation.

Note: Documents attached to denied Forms are not considered part of the official record and must be provided on replacement forms. Operator shall review the previously denied Forms for this Remediation Project and ensure all information and documentation has been provided on an approved Form 27.

Operator states: "Twenty-seven background soil samples were collected near the tank battery and analyzed for metals in soil per ECMC Table 915-1, twenty of these were analyzed for pH, EC, SAR, and boron. Background soil samples were collected from depths ranging between 0.5 to 5 feet below ground surface (ft bgs) and the lithology between the site and background locations were observed to be silty sands. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, chromium, and lead were calculated to be 28.8 mg/kg, 171 mg/kg, 0.38 mg/kg, and 23.5 mg/kg, respectively.

All arsenic, barium, chromium, and lead concentrations observed during decommissioning and supplemental site investigation (SSI) activities were below background levels."

Operator included a calculation for a site specific background level for hexavalent chromium in the attached analytical data summary tables. Hexavalent chromium was not detected above the laboratory reporting limit in the background samples. Calculations based on the laboratory reporting limit of non-detect samples are not in compliance with ECMC Table 915-1 Footnote 11 which states "The Director will consider Residential Soil Screening Level Concentrations up to 1.25 times site specific background levels for metals in soil."

The source of historical impacts at the tank battery are not readily identified and the horizontal and vertical extent of impacts have not been defined. Analytical data for multiple contaminants of concern in multiple soil samples collected on site exceeds Table 915-1 Protection of Groundwater Soil Screening Level Concentrations and/or allowable levels for Soil Suitability.

Due to the range in levels/concentrations of soil suitability parameters and metals in background samples; Operator shall generate site and depth- specific background concentrations by using analytical data from background samples at similar depths, soil horizons or lithologic materials as the confirmation soil samples to calculate the geometric mean (or other statistical analysis) for comparison. Operator shall reevaluate all analytical data collected to date using the newly calculated site and depth- specific background concentrations to determine the need for additional site investigation and/or remediation.

Additionally, background samples near the historic release cannot be approved until impacts are fully characterized and delineated. Additionally, background samples collected from areas adjacent off-location flowlines and/or within former working pad surfaces are not considered representative of native background conditions. These samples shall be omitted from future background determination calculations.

Operator shall ensure background soil samples have been/are obtained from:

- 1) Locations sufficiently away from impacted area(s) and oil and gas activities to reflect native conditions,
- 2) Similar depths and soil horizons or lithologic materials as the confirmation soil samples,
- 3) Locations with similar land use (current and historic) as the confirmation soil samples,
- 4) Locations with similar hydrologic conditions

Operator shall provide a figure depicting the correct location of all background soil samples used in the site specific background calculations. If for any reason the background samples do not meet the above criteria, then these samples shall be omitted from the site specific background determination calculations.

Note: BG sample locations depicted on attached figures to not correspond to the GPS coordinates provided.

Operator shall analyze all subsequent confirmation soil samples for complete Table 915-1 Contaminants of Concern until Operator has submitted sufficient characterization data to request and receive Director Approval of reduced list of contaminants of concern. Due to the proximity to sensitive receptors and shallow groundwater reported at nearby

	<p>remediation projects - Operator shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.</p> <p>Operator shall not delay execution of remedial or investigative actions for ECMC approval. Per Rule 912.a.(1-2): Immediately upon discovering any Spills or Releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas that meet the criteria of Rules 912.b.(1).H, I, or J, regardless of size or volume, Operators will control and contain the Spill or Release to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered.</p>	
Environmental	Previously combined document #403931369 provided a PACE analytical report dated 5/6/2023 a Summit analytical report dated 5/19/2023, and a Eurofins report dated 7/3/2023. A secured version of these reports has been attached to doc #404273106.	12/08/2025
Environmental	Form Received 1/3/2025. ECMC returned the form to draft on 1/28/2025 with the following comment: "Form returned to draft per Operator request (multiple versions of labs attached)." Form resubmitted on 4/10/2025.	12/08/2025

Total: 3 comment(s)

DENIED