

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404433431

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 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) 304-5000 |
| City: DENVER State: CO Zip: 80202 | | Mobile: () |
| Contact Person: Dan Peterson | Email: RBUEUF27@chevron.com | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33267 Initial Form 27 Document #: 403617528

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: WELL | Facility ID: _____ | API #: 123-34506 | County Name: WELD |
| Facility Name: GUTTERSEN C 33-31D | Latitude: 40.268560 | Longitude: -104.564540 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: NWSW | Sec: 33 | Twps: 4N | Range: 64W 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? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Residential 0.20mi SW
Farm Structure 0.10/0.18mi W, 0.12/0.14/0.19/0.21/0.22mi SW

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 |
|-----------|----------------|------------------|----------------------------------|
| No | GROUNDWATER | Not Impacted | Not encountered |
| No | SOILS | Not Impacted | 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.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Guttersen C33-31D wellhead and flowline (REM #33267). The wellhead was cut and capped per ECMC rules on 9/18/2024, and the decommissioning summary was reported within Approved Doc. #403968943. A soil sample was collected at the base of the wellhead excavation and the flowline riser at the wellhead, and samples were field screened at the N-E-S-W sides of the wellhead. Approximately 124' of flowline was removed per ECMC rules on 11/14/2024, and the decommissioning summary was reported within the Denied Doc. #404207334. Soil samples were taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. The soil sample collected at the flowline riser (SEP01-FL@3') at the separator was reported under REM #37759.

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):

One (1) grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. The soil sample collected at the flowline riser (SEP01-FL@3') at the separator was reported under REM #37759. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

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

If groundwater is encountered, a grab groundwater sample 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 of the wellhead and flowline areas occurred during decommissioning activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 258.1
-- Highest concentration of SAR 1.19
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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
0 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 11/14/2024 four (4) background samples were collected from one soil boring (BKG01) during the decommissioning of associated facility, Gutttersen C33-32 Tank Battery (REM #37759). On 7/22/2025 and 7/23/2025 thirty (30) background samples from five soil borings (BKG02-BKG06) were collected during the site investigation activities at Gutttersen C33-32 (REM #33271). Background soil samples were collected from depths ranging from 0.5 to 6 feet below ground surface. The collected background soil samples were submitted for Table 915-1 inorganic and metal constituents. The maximum background concentrations with a 1.25x multiplier applied for arsenic and barium were calculated to be 3.71 mg/kg and 142.5 mg/kg, respectively. The maximum background level for pH was observed to be 8.98 standard units. Residual arsenic, barium, and pH identified at the site were within background limits and therefore, in compliance with ECMC Table 915-1 standards.

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?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

No impacted material caused by oil and gas operations was identified at this time. Based on soil investigation activities and laboratory analytical results of the soil samples collected, removal of soil is not needed.

REMEDICATION 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.

Soil samples WH01@6, FLR01@4, and FL01R-W@3' were initially reported above ECMC Table 915-1 SSLs for arsenic concentrations at 1.76, 2.16, and 0.639 mg/kg, respectively. Soil sample FL01R-W@3' initially exceeded ECMC Table 915-1 SSLs for barium concentration at 92.9 mg/kg. Soil sample WH01@6 initially exceeded ECMC Table 915-1 SSLs for pH concentration of 8.33 standard units. The maximum background concentrations with a 1.25x multiplier applied for arsenic and barium were calculated to be 3.71 mg/kg and 142.5 mg/kg, respectively. The maximum background concentration for pH was observed to be 8.98 standard units. All reported constituent concentrations are therefore within acceptable background-adjusted limits. Based on site investigation results and confirmation of background conditions, no remediation plan is required.

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 initial wellhead and flowline decommissioning activities or Supplemental Site Investigation (SSI) activities.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

Request Alternative Reporting Schedule:

Semi-Annually Annually Other NFA Closure Request

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 Comprehensive Sample Summary and NFA Closure Request _____

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: \$ 0 _____

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

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. 09/18/2024

Proposed date of completion of Reclamation. 03/31/2028

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. 12/01/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/18/2024

Proposed site investigation commencement. 09/18/2024

Proposed completion of site investigation. 07/23/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/22/2025

Proposed date of completion of Remediation. 07/23/2025

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 updated to reflect the completed decommissioning and background sampling assessment at the former Guttersen C33-31D wellhead and flowline. The ECMC will be notified of any potential future schedule changes and will be updated with future reclamation activities, pending this forms approval.

OPERATOR COMMENT

This form has been submitted to provide a 4Q 2025 decommissioning progress update for the former Guttersen C33-31D wellhead and flowline (REM #33267), and to request no further action and closure (NFA). The wellhead was cut and capped per ECMC rules on 9/18/2024. Approximately 124' of flowline was removed per ECMC rules on 11/14/2024. The soil sample collected at the flowline riser at the separator (SEP01-FL@3') was reported under REM #37759.

Soil samples WH01@6, FLR01@4, and FL01R-W@3' were initially reported above ECMC Table 915-1 SSLs for arsenic concentrations at 1.76, 2.16, and 0.639 mg/kg, respectively. Soil sample FL01R-W@3' initially exceeded ECMC Table 915-1 SSLs for barium concentration at 92.9 mg/kg. Soil sample WH01@6 initially exceeded ECMC Table 915-1 SSLs for pH concentration of 8.33 standard units. On 07/22/2025 and 07/23/2025, thirty (30) background samples (BKG02-BKG06) were collected and submitted for ECMC Table 915-1 inorganic and metal constituents under Guttersen C33-32 wellhead and flowline (REM #33271), and reported within Doc. #404387826, which is currently "In Process" in Webforms. The maximum background concentrations with a 1.25x multiplier applied for arsenic and barium were calculated to be 3.71 mg/kg and 142.5 mg/kg, respectively. The maximum background concentration for pH was observed to be 8.98 standard units. Final laboratory analytical results for background samples collected on site indicate all samples are compliant with ECMC Table 915-1 or representative of native background soil concentrations. The collected backgrounds are located within a 600-foot maximum distance of the site, from similar land use (grassland), and were collected at site-relevant depths (site and background samples are between 0.5 and 6 ft bgs). A comprehensive sample summary report is attached to this form.

In response to denied ECMC comment dated 09/26/2025 (Doc. #404207334), site assessment has been completed after the collection of thirty (30) background soil samples on 07/22/2025 and 07/23/2025 under Guttersen C33-32 wellhead and flowline (REM #33271). The background sample summary and analytical results have been attached to this form.

In accordance with completed SSI activities and subsequent laboratory analytical results, Montrose is requesting NFA for the Guttersen C33-31D (REM #33267) wellhead and flowline location. All soil samples were within ECMC Table 915-1 organic concentrations. Based on background sampling results, residual arsenic, barium, and pH are representative of native soil conditions and are not indicative of oil and gas impacts.

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

Signed: Scott Williamson

Title: Environmental Consultant

Submit Date: _____

Email: NorthernColoradoPM@montrose-env.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: 33267

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

| | |
|-----------|------------------------------|
| 404442838 | SITE INVESTIGATION REPORT |
| 404442839 | LABORATORY ANALYTICAL REPORT |
| 404442841 | LABORATORY ANALYTICAL REPORT |
| 404444494 | SITE MAP |

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

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

Total: 0 comment(s)