

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:
404471500

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: <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>Erica Zuniga</u>	Email: <u>rbueuf27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11923 Initial Form 27 Document #: 401787528

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>SPILL OR RELEASE</u>	Facility ID: <u>456333</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Lower Latham 35-10B, 11B</u>	Latitude: <u>40.354020</u>	Longitude: <u>-104.625980</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>35</u>	Twps: <u>5N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

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

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Within HPH - Rule 1202.d Density Habitats: Mule Deer Severe Winter Range
609' W to Rule 309.e.1 Other Consultation Habitats: Bald Eagle Roost Site
750' W to Lower Latham Reservoir
369' S to 27.2 Freshwater Emergent Wetland
1,013' N to occupied building, 868' E to occupied building
Multiple monitoring well networks within 1/4 mile
No other potential receptors are located within 1/4 mile of the Site.
Above distances are approximations.

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	Refer to Tables and Figures	Lab analysis and field screening
Yes	SOILS	Refer to Tables and Figures	Lab analysis and field screening

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Site was dismantled and remediation was scheduled.

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):

Thirteen soil samples were collected and analyzed for TPH-DRO, TPH-GRO, BTEX, and Naphthalene by EPA Methods 8015 and 8260b. Soil sample N wall 3FT was also analyzed for SAR, EC, and pH by EPA 6020/USDA60 (2, 3A), EPA 120.1, and EPA 9045D.

Proposed Groundwater Sampling

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

Noble proposes to conduct groundwater monitoring from 11 wells (MW-1 and MW-3 through MW-12). Samples will be analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (1,2,4-TMB), 1,3,5-TMB, total dissolved solids (TDS), chloride, and sulfate by ECMC approved methods. Following four consecutive quarters of results below ECMC Table 915-1 limits for the target analytes, Noble will request a No Further Action determination for Remediation Project #11923. The 4Q 2025 quarterly groundwater monitoring event was conducted on December 5, 2025; analytical results are pending and will be submitted on a subsequent Supplemental Form 27. The next quarterly groundwater monitoring event is scheduled for March 2026.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 13

ND Highest concentration of TPH (mg/kg) _____

Air sparge / Soil vapor extraction
 Natural Attenuation
 Other _____

Name of Licensed Disposal Facility or ECMC Facility ID # _____
 No Excavate and onsite remediation
 Land Treatment
 Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Other _____

Groundwater Remediation Summary

Yes Bioremediation (or enhanced bioremediation)
 No Chemical oxidation
 Yes Air sparge / Soil vapor extraction
 Yes Natural Attenuation
 No 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.

Third quarter 2025 groundwater sampling was conducted at the Lower Latham 35-10B, 11B, location on September 3, 2025. Ten monitoring wells (MW-1, MW-3, MW-4, and MW-6 through MW-12) were sampled and submitted to Origins Laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by United States Environmental Protection Agency (EPA) Method 8260D, chloride ion and sulfate ion by EPA Method 300.0, and total dissolved solids (TDS) by EPA Method 2540C. Monitoring well MW-5 was unable to be sampled due to a potential obstruction in the well, therefore no groundwater sample was collected.

Laboratory analytical results indicate that dissolved phase organic constituents were compliant with their respective Energy and Carbon Management Commission (ECMC) Table 915-1 standards in 10 of the 11 monitoring wells sampled:

- One monitoring well exceeded the limit for 1,2,4-TMB (67 micrograms per liter [µg/L]): MW-4 (124 µg/L)

All remaining organic constituents were below ECMC Table 915-1 standards. Dissolved-phase inorganic constituents were compliant with ECMC Table 915-1 standards and/or 1.25x local background concentrations in all ten monitoring wells sampled.

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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards _____ 40

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: WM's North Weld Landfill in Ault, Colorado

Volume of E&P Waste (liquid) in barrels _____ 0

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? Yes

Does the previous reply indicate consideration of background concentrations? No

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. 07/10/2018

Proposed date of completion of Reclamation. 10/31/2027

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. 07/25/2018

Actual Spill or Release date, or date of discovery. 07/25/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/10/2018

Proposed site investigation commencement. 07/10/2018

Proposed completion of site investigation. 09/10/2018

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/10/2018

Proposed date of completion of Remediation. 03/31/2027

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The implementation schedule has changed due to allow for the four consecutive quarters of static monitoring of the 11 groundwater monitoring wells on site. The remediation system is currently still active.

OPERATOR COMMENT

This Form 27 is being submitted to include an update for the LOWER LATHAM 35-10B, 11B facility (REM #11923) and the 3Q 2025 groundwater monitoring event. One of the 10 monitoring wells sampled exceeded the ECMC Table 915-1 standard for 1,2,4-TMB (MW-4 at 124 ug/L). All remaining organic constituents were below ECMC Table 915-1 standards. All 10 monitoring wells sampled were compliant with their respective ECMC Table 915-1 standards and/or 1.25x local background concentrations for inorganic constituents. The 3Q 2025 monitoring event marks zero consecutive quarters of ECMC Table 915-1 compliant groundwater at the site.

The AS system was installed at the site in 2022, with three additional wells installed in 2024. The AS system is designed to operate 24 hours, 7 days a week, and continues to target recalcitrant organic groundwater exceedances at the site.

The 4Q 2025 quarterly groundwater monitoring event was conducted on December 5, 2025; analytical results are pending and will be submitted on a subsequent Supplemental Form 27. The next quarterly groundwater monitoring event is scheduled for March 2026.

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: Katharine Howe, PE _____

Title: Environmental Consultant _____

Submit Date: _____

Email: cvx-pm@cdhconsult.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: 11923

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

404471731	LABORATORY ANALYTICAL REPORT
404476589	MONITORING REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)