

State of Colorado  
Energy & Carbon Management Commission

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Receive Date:

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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<br>Phone: (970) 304-5000<br>Mobile: ( ) |
| Address: 1099 18TH STREET SUITE 1500 |                             |   |
| City: DENVER                         | State: CO                   | Zip: 80202  |
| Contact Person: Dan Peterson         | Email: RBUEUF27@chevron.com |   |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27990 Initial Form 27 Document #: 403328153

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 #: 123-18224       | County Name: WELD                          |
| Facility Name: HSR-HOFFMAN 3-24                | Latitude: 40.215742 | Longitude: -104.613810 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NENW                                   | Sec: 24             | 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**

Division of Water Resources (DWR) well permit 277025- is located 0.18 miles northwest of the Location. The Location is within Burrowing Owl Active Nest Site high priority habitat (HPH). East Neres Canal is located 0.13 miles west of the Location. A residential structure is located 0.18 miles northwest.

**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                                  |
|-----------|----------------|-----------------------------|---|
| No        | GROUNDWATER    | NA                          | Lab analysis and Field Screening if Encountered |
| Yes       | SOILS          | Refer to Figures and Tables | 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 Energy and Carbon Management Commission (ECMC) Rule 911 a site investigations were conducted pertaining to the HOFFMAN 3-24 wellhead cut and cap and flowline removal. On November 9, 2023, initial wellhead characterization was completed by a previous consultant. One soil sample from the excavation base was submitted for laboratory analysis of Table 915-1 organic and soil suitability for reclamation (SSR) constituents and results indicated compliance. However, this sample has been included in Chevron's data integrity review and will not be used for site compliance.

On January 18, 2024, a previous consultant conducted an investigation after removing 1,943 feet of flowline. Soil was field-screened at 12 locations along the flowline. Three soil samples were analyzed for all Table 915-1 constituents. Exceedances were reported in all three samples including arsenic, barium, and pH. The separator end of the flowline is being reported under REM 27982.

In September 2024 and January 2025, supplemental site investigations were completed by a previous consultant to delineate inorganic exceedances along the flowline. A total of 39 soil samples were collected between 1 and 4 feet bgs from 28 locations. Exceedances of SSRs and or metals were identified in all samples.

In August 2025, a confirmation soil sample was collected at the wellhead to obtain valid point of compliance data and analyzed by a certified laboratory for the full extent of ECMC Table 915-1. Laboratory results indicate Table 915-1 compliance except for arsenic, barium, and selenium above established background concentrations.

**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 ):

Confluence is in the process of obtaining and analyzing data from past site investigation efforts to determine if project closure can be requested. If necessary, background samples will be collected to establish the range of values for naturally occurring inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further delineation may be completed at the wellhead and flowline site investigation areas to address elevated SSRs and metals.

**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 area 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 6.46

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

### 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 January 21 and August 21, 2025, nine background soil samples were collected by a previous consultant and analyzed for Table 915-1 inorganics (SSRs and metals). It appears that this data has not been reported to the ECMC. Confluence is in the process of obtaining and analyzing data from past site investigation efforts and all applicable data will be reported on the next 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?

Confluence is in the process of obtaining and analyzing data from past site investigation efforts to determine if project closure can be requested. If necessary, background samples will be collected to establish the range of values for naturally occurring inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further delineation may be completed at the wellhead and flowline site investigation areas to address elevated SSRs and metals.

## 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.

### 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.

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.

## **Soil Remediation Summary**

**In Situ**

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

**Ex Situ**

\_\_\_\_\_ 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 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 and SSIP

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

Reclamation will be completed 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. 01/11/2023

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/09/2023

Proposed site investigation commencement. 04/01/2023

Proposed completion of site investigation. 03/31/2026

### 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 activities and data review. Laboratory analytical and spatial data associated with previously reported characterization activities are being obtained and require review prior to determining whether additional site investigation is necessary.

Following review of pending data, if warranted, supplemental site investigation will be completed to characterize native soil conditions. Results of any additional investigation 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 site investigation results indicate the need for remedial activities, a proposed schedule will be provided.

**OPERATOR COMMENT**

This form has been submitted to satisfy the quarterly reporting requirement for the HSR-HOFFMAN #3-24 (Remediation Project 27990) and to propose additional background soil sampling.

Based on initial review of available data, no organic impacts have been identified at the site. Following review of pending data, if warranted, supplemental site investigation will be completed to characterize native soil conditions. Results of any additional investigation will be reported in a subsequent Form 27.

Remediation and site investigation, previously directed by a former consultant, is now under the direction of Confluence Compliance Companies, LLC (Confluence). Confluence is working with Chevron to establish a remediation/site investigation schedule which will be proposed in a subsequent Form 27. 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: Chris McKisson

Title: Sr. Scientist

Submit Date: \_\_\_\_\_

Email: cvx-rem@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: 27990

**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**

|  |  |
|--|--|
|  |  |
|--|--|

Total Attach: 0 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

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

Total: 0 comment(s)