

State of Colorado
Energy & Carbon Management Commission

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404323794
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Report taken by:
Nick Cholas

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>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Dan Peterson</u>	Email: <u>danpeterson@chevron.com</u>	Phone: <u>(970) 730-7281</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38625 Initial Form 27 Document #: 403993062

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>310513</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>ALEXANDER F-65N65W 33NWSE</u>	Latitude: <u>40.355321</u>	Longitude: <u>-104.667805</u>	
	** correct Lat/Long if needed: Latitude: <u>40.354918</u>	Longitude: <u>-104.661420</u>	
QtrQtr: <u>NWSE</u>	Sec: <u>33</u>	Twp: <u>5N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>489602</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Alexander F-65N65W 33NWSE</u>	Latitude: <u>40.355231</u>	Longitude: <u>-104.661336</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>33</u>	Twp: <u>5N</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 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

Bald Eagle Roost or Communal Roost HPH 0.1mi SE
Riverine 0.16mi NE
Freshwater Pond 0.22mi SE, 0.24mi SW
Residential 0.05/0.21/0.25mi SE, 0.09/0.13mi E, 0.08mi NE
Farm Structure 0.04/0.06/0.07/0.14/0.17/0.18mi E, 0.21mi SE, 0.06mi NE

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	Field Screening and Lab Analysis, if encountered
Yes	SOILS	Refer to Tables and Figures	Field Screening and Lab Analysis

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 during decommissioning at the Alexander F-65N65W 33NWSE tank battery location on 03/21/25. The tank battery was decommissioned in accordance with ECMC rules. Laboratory soil samples were collected from the excavation base of the partially-buried produced water vessels (PWV01-B, PWV02-B, PWV03-B, PWV04-B@4'), from the N, W, S, and E excavation sidewalls (PWV01-W, S, E; PWV02-W, E; PWV03-W, E; PWV04-W, E, N@2.5'), from beneath the above ground storage tanks (AST01, AST02, AST03, AST04@0-6"), beneath the separator risers for the dumplines (SEP01-DL, SEP02-DL@2.5'), and beneath the hammer union riser connecting the flowlines to a single separator (SEP01-FL). Samples were collected and field screened from beneath the former locations of the emission control devices (FLARE01, FLARE02@0-6"), meter house (MH01@0-6"), and water dumpline (WDL01@2.5'). Due to field indicators of elevated PID and hydrocarbon odor observed during decommissioning, this facility was reported as a potential historic release.

Laboratory analytical results indicated that organic constituents benzene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, benzo(a)anthracene, 1-methylnaphthalene (M), and 2-M were detected in exceedance of ECMC Table 915-1 regulation in sample locations PWV01-W, PWV02-E, and PWV03-B. These were reported as a historic release on Form 19 Document # 404138260 (Spill ID # 489602).

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):

Soil samples were collected as described in the Initial Action Summary of this Form 27. Sampling deviated from the approved proposed sampling plan because a single flowline riser sample was collected at the separator (SEP01-FL) due to a hammer union joining the associated flowlines.

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, 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 during the site investigation a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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):

During tank battery decommissioning activities, personnel field screened disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. Confirmation soil samples submitted for laboratory analysis were analyzed for full ECMC Table 915-1 constituents. A detailed summary of tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was submitted as an attachment to Form 27 # 404137957.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 21

Number of soil samples exceeding 915-1 21

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

Approximate areal extent (square feet) 2100

NA / ND

-- Highest concentration of TPH (mg/kg) 350

-- Highest concentration of SAR 2.25

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 4

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 3/24/25, 8 background soil samples were collected from 2 discrete locations (BKG01, BKG02) near the Alexander 33-2 Flowline (Rem # 38591), nearby the Alexander F-65N65W 33NWSE tank battery, and were analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background samples were collected from depths ranging from 0 to 4 feet below ground surface. The maximum background pH was observed to be 8.95. The maximum background concentrations with a 1.25x multiplier applied for arsenic and selenium were calculated to be 0.965 mg/kg and 0.484 mg/kg, respectively.

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?

Based on the decommissioning analytical results, a supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the organic and inorganic exceedances identified during decommissioning and to collect additional background samples.

Proposed soil borings BH01, BH03, and BH07-BH11 will vertically and horizontally delineate the benzene, 1,2,4-trimethylbenzene(TMB), 1,3,5-TMB, naphthalene, benzo(a)anthracene, 1-methylnaphthalene(M), and 2-M exceedances observed at sample locations PWV01-W@2.5', PWV02-E@2.5', and PWV03-B@4'. Proposed soil borings BH02, BH04-BH06, and BH08-BH11 will confirm, as well as vertically and horizontally delineate the pH, arsenic, and selenium exceedances observed at sample locations AST01@0-6", PWV01-B@4', PWV01-E@2.5', PWV01-W@2.5', PWV02-E@2.5', and PWV03-E@2.5'. During the SSI, soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

Concurrently with the SSI, additional background sampling will be conducted (BKG04-BKG08) to determine if pH, arsenic, and selenium concentrations observed during decommissioning are attributed to native soil conditions at the site. Background soil samples will be collected and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. These background boring locations will also be used for nearby the Alexander 33-2 & Alexander F33-24 flowlines (Rem # 38591, API #s 05-123-13896 & 05-123-25301).

The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27. The proposed soil sampling locations are shown on the site investigation map attached to a previous Form 27 (ECMC Document # 404137957).

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.

Refer to the Remediation Summary section below.

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 supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the benzene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, naphthalene, benzo(a)anthracene, 1-methylnaphthalene(M), and 2-M exceedances identified at soil sample locations PWV01-W@2.5', PWV02-E@2.5', and PWV03-B@4', and to delineate the pH, arsenic, and selenium exceedances identified at AST01 @0-6", PWV01-B@4', PWV01-E@2.5', PWV01-W@2.5', PWV02-E@2.5', and PWV03-E@2.5' during decommissioning. The SSI will be completed in accordance with the proposed site investigation map attached to a previous Form 27 #404137957, and proposed sampling plan outlined in the Site Investigation Report section of this 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

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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 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 Timeline Update

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 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. 03/21/2025

Proposed date of completion of Reclamation. 08/11/2027

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. 10/02/2024

Actual Spill or Release date, or date of discovery. 03/21/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/21/2025

Proposed site investigation commencement. 02/10/2026

Proposed completion of site investigation. 02/11/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/11/2026

Proposed date of completion of Remediation. 02/11/2027

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 not changed from the schedule proposed in previous Form 27 # 404146487, which is still pending approval as of the submission of this report. The proposed site investigation will be completed following the approval of this form, and is tentatively scheduled for commencement on 02/10/26. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

OPERATOR COMMENT

This Form 27 is being submitted as a 3Q25 timeline update for the proposed site investigation at the Alexander F-65N65W 33NWSE Tank Battery.

The implementation schedule has not changed from the schedule submitted in Form 27 # 404137957. The proposed site investigation will be completed following the approval of this form, and is tentatively scheduled for commencement on 02/10/26. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

The results of the proposed supplemental site investigation will be submitted on a subsequent Form 27. Per ECMC 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: McKenzie Reynolds

Title: Environmental Scientist

Submit Date: 09/03/2025

Email: mreynolds@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: Nick Cholas

Date: 12/29/2025

Remediation Project Number: 38625

COA Type**Description**

	See comments/COA's on SF27 Doc #404447455.
	SF27 Doc #404447455 is the most recent submittal for REM #38625.
1 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**

404323794	FORM 27-SUPPLEMENTAL-SUBMITTED
404340697	SITE INVESTIGATION PLAN

Total Attach: 2 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)