FORM 27 Rev 5/22

# State of Colorado
# Energy & Carbon Management Commission

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Report taken by: Candice (Nikki) Graber

## 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 INFORMATON

Name of Operator: NOBLE ENERGY INC Operator No: 100322
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Dan Peterson Email: RBUEUF27@chevron.com

**Phone Numbers**
Phone: (970) 304-5000
Mobile: ( )

## PROJECT, PURPOSE & SITE INFORMATION

### PROJECT INFORMATION

Remediation Project #: 30816 Initial Form 27 Document #: 403466390

### 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.
- [X] 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.
- [X] 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: WELL Facility ID: API #: 123-31314 County Name: WELD
Facility Name: Shable USX AB 11-14P Latitude: 40.582301 Longitude: -104.518975
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESW Sec: 11 Twp: 7N Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 485665 API #: County Name: WELD
Facility Name: Shable USX AB 11-14P Latitude: 40.582301 Longitude: -104.518975
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESW Sec: 11 Twp: 7N Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 486450 API #: County Name: WELD

Facility Name: Shable USX AB 11-14P Latitude: 40.582301 Longitude: -104.518975

** correct Lat/Long if needed: Latitude: Longitude:

QtrQtr: SESW Sec: 11 Twp: 7N Range: 64W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Cropland

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? No

**Other Potential Receptors within 1/4 mile**

Well Within Pronghorn Winter Concentration Area HPH
Other 0.2mi NW
No other potential receptors are located within ¼ mile of the Site.
Above distances are approximations.

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

## 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 pertaining to the SHABLE USX AB11-14P flowline removal. Approximately2,360' of flowline was removed, however a portion of the flowline was abandoned-in-place due to field constraints. The ECMC was updated in a supplemental Form 27. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. So as to not disturb the area of field constraint, soil samples were taken at the start and endpoint of the flowline where the area exists. Soil samples were also taken along the flowline 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 Flowline Pre-Abandonment Notice Document number was previously included under Related Forms.

## PROPOSED SAMPLING PLAN

### Proposed Soil Sampling

[X] 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 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, AS APPLICABLE to abandonment type. 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. A grab confirmation soil sample will be collected at the wellhead excavation in base of the excavation or the area showing the highest degree of impact during abandonment activities.

### Proposed Groundwater Sampling

[X] 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 full Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS)

### 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 along the flowline and at the wellhead and separator areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The applicable ECMC Closure Checklists were utilized and filled out during the abandonment process. A photolog was attached.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 18

Number of soil samples exceeeding 915-1 9

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

Approximate areal extent (square feet) 900

**NA / ND**

-- Highest concentration of TPH (mg/kg) 1633

-- Highest concentration of SAR 8.51

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?

Fifteen background soil samples were collected from an area not impacted by oil and gas development and at similar depths and lithologies as confirmation soil samples collected at the location and analyzed for Table 915-1 metals and SSR constituents. Background soil sample analytical results were reported with elevated levels of pH, EC, SAR, Arsenic (As), Barium (Ba), Cadmium (Cd), Lead (Pb) and Selenium (Se).

Background Soil Sample Analysis (mg/kg)
Total pH: Max = 8.47
Total EC: Max = 4.81
Total SAR: Max = 9.68
Total As: Max*1.25 = 9.90
Total Ba: Max*1.25 = 224
Total Cd: Max*1.25 = 0.808
Total Pb: Max*1.25 = 20.9
Total Se: Max*1.25 = 1.18

☐ 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?

Elevated pH was observed in multiple locations at the former Shable USX AB 11-14P flowline. Soil will be resampled and analyzed for the full Table 915-1 analyte suite at the 14FL09@5.0' and 14FL11@4.0' and 14FL14@6' sample locations at the same depth where the initial elevated pH concentrations were observed. Noble will request an NFA be granted if the reanalyzed samples comply with the Table915-1 concentration standard. Background samples will be used to justify elevated concentrations.

Alternatively, if the sample results exceed the Table 915-1 standards and cannot be attributed to native soil conditions via background soil characterization a minimum of five additional samples will be collected to delineate the magnitude and extent of elevated constituents.

Following completion of the delineation, Noble will submit a detailed reclamation plan to address elevated SSR constituents that includes, but is not limited to, soil analysis from adjacent undisturbed lands, revegetation techniques, site stabilization, and details of seeded species and will request NFA designation be granted under Rule 915.b: Request to leave elevated inorganics in situ.

In addition, Additional background samples will be collected in five locations from an area not impacted by oil and gas development at similar depths (3',4',5',6',7',8' and 9') and lithologies as confirmation samples collected at the location and analyzed for ECMC Table 915-1 metals and soil suitability for reclamation standards (SSR) (pH, EC, SAR, and Boron).

# 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 location 14FL01@4.5' were removed through a remedial excavation. Remedial excavation confirmation soil samples were collected and analyzed for full ECMC Table 915-1 constituents. The impacted soil was disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

The organic compound exceedances observed at sample location WH-SS-01@7', WH-SS-03@7', WH-FS-01@8' will be removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The impacted soil will be disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests will be available upon request.

## 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.

Laboratory analytical results indicated a historical release had occurred at the location of soil samples 14FL01@4.5', WH-SS-01@7', WH-SS-03@7', WHFS -01@8' and was reported as a historic release in Form 19 document numbers 4403612669 and 403660699.

The source was excavated at the Shable USX AB 11-14P wellhead flowline riser location (14FL01@4.5') and confirmation soil samples were collected and analyzed for the full Table 915-1 suite. Additional excavation is needed to remove impacts observed at seven-and-eight feet in the Shable USX AB 11 -14P former wellhead location. Elevated concentrations of Table 915-1 soil suitability for reclamation (SSR) constituents and Table 915-1 metals observed in the flowline riser excavation confirmation samples will be removed via excavation during impact removal at the adjacent wellhead.

If groundwater is encountered during the excavation of impacted soil, a groundwater sample will be collected for Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS). Should no additional active remediation be required following source removal at the location, a no further action (NFA) determination will be requested within 90 days following laboratory confirmation of the removal of impacted soils with respect to the applicable Table 915-1 screening levels at the site.

If groundwater impacts are observed, an NFA will be requested once four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents below regulatory limits. As needed, soil and/or groundwater remediation plans will be developed and submitted to ECMC in a supplemental Form 27.

### Soil Remediation Summary

☐ **In Situ**

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

☒ **Ex Situ**

- Yes Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) 32
  - 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

- ____ 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.

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for full Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS).

# REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

**Approved Reporting Schedule:**

[X] 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

[X] 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 (policy 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 32

E&P waste (solid) description Hydrocarbon Impacted Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Buffalo Ridge Landfill, Keenesburg, CO

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? No

Does the previous reply indicate consideration of background concentrations?

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 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?

[X] 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. 10/31/2025

Proposed date of completion of Reclamation. 06/30/2027

# 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. 07/06/2023

Actual Spill or Release date, or date of discovery. 12/01/2023

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/07/2023

Proposed site investigation commencement. 08/14/2023

Proposed completion of site investigation. 03/31/2026

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/25/2024

Proposed date of completion of Remediation. 03/31/2026

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.

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

Basis for change in implementation schedule:

Qualified excavation crew is not immediately available but is expected to commence the work in Q1 2026.

The implementation schedule has been changed due to the need to resample soil sample locations 14FL09@5.0', 14FL11@4.0', and 14FL14@6' along the Shable USX AB 11-14P flowline, collect additional background samples, and remove soil impacts at the former Shable USX AB 11-14P wellhead and wellhead flowline riser.

## OPERATOR COMMENT

This form serves to comply with the Rule 913.e. reporting schedule. The review status of the previously proposed workplan (Doc. # 404062586) is "In Process" on Web Forms. Pending ECMC EPS form review/approval, the Operator will complete the additional site investigation and remediation as outlined on Doc. # 404062586 and this F27. Supplemental Form 27s will be prepared and submitted on a quarterly schedule to provide updates and progress of the remediation until closure criteria has been achieved.

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

Signed: Jeff Griggs  Title: Consultant

Submit Date: 01/16/2026  Email: jeffg@fremontenv.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: Candice (Nikki) Graber  Date: 01/16/2026

Remediation Project Number: 30816

| COA Type | Description |
|---|---|
| | Rule 912.a.(2) and Rule 913.d.(1) requires that Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Rule 913.b.(2) is clear on the requirements for Operators to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1. |
| | ECMC has processed this form as an update; no analytical was attached thus approval of this form does not imply any agreement with comments on completion of site investigation. All ongoing/unaddressed comments/COAs from previous Forms remain applicable. |
| | Pursuant to Rule 913.d, Operator will adhere to the proposed schedule. Any deviation from the schedule must be approved by the Director in writing on a Form 27 Supplemental Report. |
| | Waste manifests are required prior to closure. |
| 4 COAs | |

### 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 |
|---|---|
| 404499979 | INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL) |
| 404500016 | REMEDIAL ACTION PLAN |
| 404509234 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 3 Files

## General Comments

| User Group | Comment | Comment Date |
|---|---|---|
| | | Stamp Upon Approval |

Total: 0 comment(s)