

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:  
404306622  
Receive Date:  
08/20/2025

Report taken by:  
Taylor Robinson

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: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers Phone: (970) 730-7281 Mobile: ( )
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30722 Initial Form 27 Document #: 403464005

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: LOCATION	Facility ID: 329913	API #: _____	County Name: WELD
Facility Name: SPOMER-65N66W 32SESE	Latitude: 40.350710	Longitude: -104.796440	
** correct Lat/Long if needed: Latitude: 40.350234		Longitude: -104.795704	
QtrQtr: SESE	Sec: 32	Twp: 5N	Range: 66W Meridian: 6 Sensitive Area? Yes
Facility Type: TANK BATTERY	Facility ID: 488299	API #: _____	County Name: WELD
Facility Name: SPOMERT5N-R66W-S32 L02	Latitude: 40.350072	Longitude: -104.795908	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 32	Twp: 5N	Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 489218 API #: \_\_\_\_\_ County Name: WELD  
Facility Name: SPOMER-65N66W 32SESE Latitude: 40.350067 Longitude: -104.795978  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: SESE Sec: 32 Twp: 5N Range: 66W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Rangeland

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

Riverine 0.17mi SW, 0.19mi NE and 0.18 miles SW  
Farm Structures 0.10/0.11/0.11/0.13/0.15mi SE  
Residential Structures 0.12/0.14mi SE  
100-year floodplain 0.17 mi SE  
Mule Deer Winter Concentration Area 0.03 mi SE  
Within Mule Deer Severe Winter Range  
Freshwater emergent 0.02 miles W

# 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 SPOMER-65N66W 32SESE (AKA Spomer T5N-R66W-S32 L02) Facility and Tank Battery location. The tank battery was decommissioned on 1/9/2025 in accordance with ECMC rules. Laboratory soil samples were collected from the partially-buried produced water vessel excavation base (PVW01-B@4') and N, W, S, & E sidewalls (PVW01-N@2' to PVW01-S@2') and from beneath the above ground storage tank (AST01@0-6"). Lab samples were also collected beneath the separator risers at the dumpline (SEP01-DL@3') and at the flowline (SEP01-FL@3'). Field screening samples were collected from beneath the flare location (FLARE01@0-6") and meter house (MH01@0-6"). Due to field indicators observed during decommissioning (odor and PID: 138.0 ppm), sample AST01@0-6" was reported as a potential historic release.

Laboratory analytical results indicated that organic constituents 1,2,4-trimethylbenzene (TMB) and 1,3,5-TMB, were detected at sample location AST01@0-6" in exceedance of ECMC Table 915-1 regulatory standards. This was assigned Spill ID 489218 under Form 19 Doc # 404138984.

## 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. Soil samples were analyzed by a certified laboratory, using approved ECMC laboratory analysis methods, 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 sample 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 ):

Visual inspection at the tank battery area occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of the tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to Form 27 Document # 404054533.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 8  
Number of soil samples exceeding 915-1 6  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 300

### NA / ND

-- Highest concentration of TPH (mg/kg) 0.69  
-- Highest concentration of SAR 0.304  
BTEX > 915-1 No  
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 01/09/2025, five background soil samples were collected from one discrete location (BKG01) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. During Site Investigation activities on 06/19/2025, fifteen background soil samples were collected from five discrete locations (BKG02-BKG06) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging between 0 to 5 feet below ground surface (ft bgs). The maximum background concentration for pH was observed to be 8.36. The maximum background concentrations with a 1.25x multiplier applied for arsenic and selenium were calculated to be 28.3 mg/kg and 6.5 mg/kg, respectively. All arsenic and selenium concentrations observed during decommissioning were below background levels.

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?

See the Remedial Action Plan section of this Form 27.

## 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 1,2,4-trimethyl-benzene (TMB) and 1,3,5-TMB exceedances observed during decommissioning at sample location AST01@0-6" will be removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Following the completion of the remedial excavation, additional investigation activities will be completed to further investigate the pH exceedances observed in decommissioning soil samples at the site. The results of the remedial excavation will be submitted on a subsequent Form 27.

### 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 Site Assessment was conducted on 6/19/2025. Fifteen background soil samples were collected from five discrete locations (BKG02-BKG06) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The results of the June 2025 background sampling event are summarized in the Site Investigation Report section of this Form 27.

## 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 the initial site decommissioning activities or supplemental site investigation 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 Supplemental Site Assessment Sample Summary,  
Supplemental Source Mass Removal Proposal \_\_\_\_\_

## 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. 01/09/2025

Proposed date of completion of Reclamation. 02/18/2027

## 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. 01/09/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/09/2025

Proposed site investigation commencement. 08/18/2025

Proposed completion of site investigation. 05/18/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/18/2025

Proposed date of completion of Remediation. 08/18/2026

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.

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

Basis for change in implementation schedule:

The implementation schedule has been changed due to the completion of the June 2025 supplemental site investigation (SSI) at the Spomer T5N-R66W-S32 L02 Facility and Tank Battery location and necessity for remedial excavation activities at the former tank battery. The proposed remedial excavation will be completed following the approval of this form

**OPERATOR COMMENT**

This Form 27 is being submitted to include the supplemental site investigation (SSI) results for the SPOMER-65N66W 32SESE (AKA Spomer T5N-R66W-S32 L02) Facility and Tank Battery location.

A proposal to excavate the organic compound exceedances identified during decommissioning (soil sample AST01@0-6") is presented in the Remedial Action Plan section of this Form 27. A comprehensive data packet summarizing the SSI activities is attached to this Form 27, and a detailed summary of the previously completed SSI activities is presented in the Remedial Action Plan sections and below. Following the completion of the remedial excavation, additional investigation activities will be completed to further investigate the pH exceedances observed in decommissioning soil samples at the site. The results of the remedial excavation will be submitted on a subsequent Form 27.

On 01/09/2025, five background soil samples were collected from one discrete location (BKG01) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. During Site Investigation activities on 06/19/2025, fifteen background soil samples were collected from five discrete locations (BKG02-BKG06) and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging between 0 to 5 feet below ground surface (ft bgs). The maximum background concentration for pH was observed to be 8.36. The maximum background concentrations with a 1.25x multiplier applied for arsenic and selenium were calculated to be 28.3 mg/kg and 6.5 mg/kg, respectively. All arsenic and selenium concentrations observed during decommissioning were below background levels.

Pursuant to ECMC Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the remedial excavation will be submitted on a subsequent Form 27.

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

Signed: Eric Vonde

Title: Environmental Consultant

Submit Date: 08/20/2025

Email: evonde@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: Taylor Robinson

Date: 01/23/2026

Remediation Project Number: 30722

**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**

404306622	FORM 27-SUPPLEMENTAL-SUBMITTED
404323563	SITE INVESTIGATION REPORT
404323564	LABORATORY ANALYTICAL REPORT

Total Attach: 3 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

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

Total: 0 comment(s)