

State of Colorado
Energy & Carbon Management Commission

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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 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>		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 #: 37325 Initial Form 27 Document #: 403928292

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>LOCATION</u>	Facility ID: <u>422215</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>GARCIA USX AB 35-10D TANK</u>	Latitude: <u>40.529490</u>	Longitude: <u>-104.508010</u>	
	** correct Lat/Long if needed: Latitude: <u>40.529602</u>	Longitude: <u>-104.508006</u>	
QtrQtr: <u>NESE</u>	Sec: <u>35</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Cropland

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

Within Pronghorn Winter Concentration Area HPH

Within Mule Deer Severe Winter Range HPH

Riverine 0.13mi N

Residential 0.03/0.09mi N

Farm Structure 0.02mi W, 0.03/0.04/0.06/0.08/0.12/0.13/0.14/0.15mi N, 0.05/0.08/0.14/0.15mi NE, 0.03/0.07/0.12/0.13mi E

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 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	Lab analysis and field screening, if encountered
Yes	SOILS	Refer to tables & 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.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Garcia USX AB 35-10D Tank (AKA Torres Garcia USX T7N-R64W-S35 L01) location. The tank battery was decommissioned per ECMC rules on 11/13/2024 and 11/19/2024. Laboratory soil samples were collected from beneath the above ground storage tanks (AST01@0-6", AST02@0-6", AST03@0-6"), at the risers for the dumplines (SEP01-DL@2.5', SEP02-DL@2.5') and flowlines (SEP02-FL@1', SEP01-FL@0-6") of the separators, and from the base of the produced water vault excavations (PWV01-B@4', PWV02-B@4'). Field-screened soil samples were collected from the N-E-S-W sidewalls of the produced water vault excavations (PWV01-N@2.5' through PWV01-W@2.5', PWV02-W@2.5', PWV02-E@2.5'). The sidewall samples with the highest screening levels were submitted for laboratory analysis (PWV01-W@2.5', PWV02-E@2.5'). All samples were field screened prior to lab analysis. Soil samples were field screened at the emission control device (FLARE01@0-6") and meter house (MH01@0-6"). The on-site dump lines located between the separator and the tank battery were removed.

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):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), at the risers for the flowline (s) and dumpline(s) of any separator(s). In addition, the on-site dump lines located between the separator and tank battery were removed by pulling from either end. 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, and 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 site investigation activities, a grab groundwater sample will be collected and analyzed for all organic and inorganic compounds per ECMC 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 of the tank battery area occurred during decommissioning activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 19
Number of soil samples exceeding 915-1 4
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 400

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 9.74
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 5

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 11/15/2024, twenty background soil samples were collected from five soil borings under Garcia USX AB35-10D Flowline (REM # 37319). The background samples were collected and analyzed for ECMC Table 915-1 inorganic and metal constituents. Due to close proximity and similar native lithology to that observed on site, the collected soil background samples are being reported with the current REM #37325. The backgrounds were collected between approximately 0-1 and 8 feet below ground surface (ft bgs). The max. background pH, EC, and SAR was observed to be 8.68, 6.34, and 12.6, respectively. The max. background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, and selenium were calculated to be 11.975, 360, 0.470, and 0.733 mg/kg, respectively. All constituents in the soil samples collected at the site are within Table 915-1/max background limits except pH (AST01-03, SEP01-DL, SEP02-DL, PWV01-B); EC and Boron (SB04@2.5', SB08@4'); Ba (SB06@5'); and Cr (SB05@2.5').

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?

Soil samples collected during the 11/13/2024, site investigation were analyzed outside of allotted holding times due to delays at Summit Scientific Laboratory. Operator's business partner has resampled the affected locations with results included in this Form 27.

A phased Supplemental Site Investigation (SSI) will be conducted to vertically and horizontally delineate the EC and Boron exceedances identified at sample locations SB04@2.5' and SB08@4', and to vertically delineate the pH exceedances at AST01, AST02, AST03, SEP01-DL, SEP02-DL, and PWV01-B. The collected samples will be submitted for Full ECMC Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and submitted for ECMC Table 915-1 inorganic and metal analysis to determine if the pH, EC, Boron, barium, and chromium exceedances are attributed to native soil conditions at the site. Upon receipt of analytical results, vertical and horizontal delineation of the barium exceedance at SB06@5' and the chromium exceedance at SB05@2.5' will be conducted, if needed. The collected samples will be submitted for Full ECMC Table 915-1 analysis. See the attached figure depicting the proposed soil sample locations.

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 impacted material caused by oil and gas operations was identified at this time.

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.

Soil samples collected during the 11/13/2024, site investigation were analyzed outside of allotted holding times due to delays at Summit Scientific Laboratory. Operator's business partner has resampled the affected locations with results included in this Form 27.

A phased SSI will be conducted to vertically and horizontally delineate the EC and Boron exceedances identified at sample locations SB04@2.5' and SB08@4', and to vertically delineate the pH exceedances at AST01, AST02, AST03, SEP01-DL, SEP02-DL, and PWV01-B. The collected samples will be submitted for full ECMC Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and submitted for ECMC Table 915-1 inorganic and metal analysis to determine if the pH, EC, Boron, barium, and chromium exceedances are attributed to native soil conditions at the site. Upon receipt of analytical results, vertical and horizontal delineation of the barium exceedance at SB06@5' and the chromium exceedance at SB05@2.5' will be conducted, if needed. The collected samples will be submitted for full ECMC Table 915-1 analysis. See the attached figure depicting the proposed soil sample locations.

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 and SSI 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, SSI Sample Summary, and SSI 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? 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?

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. 11/13/2024

Proposed date of completion of Reclamation. 12/31/2028

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. 09/05/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/13/2024

Proposed site investigation commencement. 12/16/2025

Proposed completion of site investigation. 09/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/30/2026

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 been modified to reflect the necessity for Supplemental Site Investigation (SSI) activities and additional background sampling adjacent to the facility at the Garcia USX AB 35-10D Tank Battery. The proposed site investigation is tentatively scheduled for completion by the end of 3Q 2026.

OPERATOR COMMENT

This form has been submitted to provide a 1Q 2026 quarterly update and supplemental sample summary for the Garcia USX AB 35-10D Tank Battery (REM #37325), as well as to propose supplemental investigation. Remediation and site investigation is now under the direction of Montrose Environmental (Montrose). Soil samples collected during the 11/13/2024, site investigation were analyzed outside of allotted holding times due to delays at Summit Scientific Laboratory. Operator's business partner has resampled the affected locations with results included in this Form 27. An SSI was conducted on 12/16/2025, to recollect confirmation sampling at sample location SEP01-FL to confirm the observed barium and cadmium exceedances, as previously proposed on Doc. #404309815, and to horizontally delineate the observed pH exceedances at AST01, AST02, AST03, SEP01-DL, SEP02-DL, and PWV01-B. Samples collected were submitted for full ECMC Table 915-1 analysis. All constituents in the soil samples collected at the site are within Table 915-1/max background limits except EC and Boron (SB04@2.5', SB08@4'); barium (SB06@5'); and chromium (SB05@2.5'). The Site Investigation Report and Analytical Results for the SSI activities conducted on 12/16/2025, are attached within the current form.

Twenty (20) background soil samples were collected on 11/15/2024, from five (5) soil borings taken at similar depths to the current REM, during an SSI conducted at the associated flowline Garcia USX AB35-10D Flowline (REM # 37319) which is located within the same soil map unit "Otero sandy loam, 1 to 3 percent slopes" as the current REM. The background samples were collected and analyzed for ECMC Table 915-1 inorganic and metal constituents. Due to close proximity and similar native lithology to that observed on site, the collected soil background samples are being reported with the current REM #37325.

A phased Supplemental Site Investigation (SSI) will be conducted to vertically and horizontally delineate the EC and Boron exceedances identified at sample locations SB04@2.5' and SB08@4', and to vertically delineate the pH exceedances at AST01, AST02, AST03, SEP01-DL, SEP02-DL, and PWV01-B. The collected samples will be submitted for Full ECMC Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and submitted for ECMC Table 915-1 inorganic and metal analysis to determine if the pH, EC, Boron, barium, and chromium exceedances are attributed to native soil conditions at the site. Upon receipt of analytical results, vertical and horizontal delineation of the barium exceedance at SB06@5' and the chromium exceedance at SB05@2.5' will be conducted, if needed. The collected samples will be submitted for Full ECMC Table 915-1 analysis. See the attached figure depicting the proposed soil sample locations.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation 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: Richie Blessing

Title: Environmental Consultant

Submit Date: _____

Email: NorthernColoradoPM@montrose-env.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: 37325

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

404506331	ANALYTICAL RESULTS
404519916	SITE INVESTIGATION PLAN
404519966	SITE INVESTIGATION REPORT

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)