

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Abdul Elnajdi

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>Dan Peterson</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39119 Initial Form 27 Document #: 404069226

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>481565</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>NENE 15-6N-64W Speicher TB Loc</u>	Latitude: <u>40.492155</u>	Longitude: <u>-104.527082</u>	
	** correct Lat/Long if needed: Latitude: <u>40.492329</u>	Longitude: <u>-104.527126</u>	
QtrQtr: <u>NENE</u> Sec: <u>15</u> Twp: <u>6N</u> Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>			
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>491963</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>NENE 15-6N-64W Speicher</u>	Latitude: <u>40.492451</u>	Longitude: <u>-104.527179</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>NENE</u> Sec: <u>15</u> Twp: <u>6N</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 Mule Deer Severe Winter Range HPH
Pronghorn Winter Concentration Area HPH 0.04mi E
Freshwater Emergent Wetland 0.01mi N
Freshwater Pond 0.01/0.03mi N, 0.19mi NW, 0.21/0.24mi E, 0.24mi SE, 0.25mi W
Residential 0.16mi NW, 0.13/0.15/0.16/0.18mi S
Farm Structure 0.05/0.07/0.1/0.15/0.19mi E, 0.05mi NE, 0.15/0.16mi NW, 0.07/0.1/0.16/0.17mi S, 0.07/0.11/0.15/0.16/0.18/0.2mi SE

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
UNDETERMINED	GROUNDWATER	NA	Lab Analysis and Field Screening, if encountered
Yes	SOILS	Refer to Tables and 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.

On 5/13/2025, a site investigation was conducted pertaining to the decommissioning activities at the NENE 15-6N-64W Speicher TB Loc. (AKA Speicher T6N-R64W-S15 L01) location. Laboratory confirmation soil samples were collected from the produced water vessel (PWV) excavation base (PWV01-B) and field screening samples were taken from the N, W, S, & E sidewalls. The screening sample with the highest screening level (PWV01-N) was collected for laboratory analysis from the N sidewall. Laboratory soil samples were also collected from beneath the above-ground storage tank (AST01), and beneath the flowline and dump line risers of the separator (SEP01-FL, SEP01-DL). Field screening samples were collected beneath the meter house (MH01) and emission control device (FLARE01). The on-site dump lines located between the separator and tank battery were removed by pulling from either end.

Laboratory results indicated that naphthalene and benzo(a)anthracene concentrations were in exceedance of ECMC Table 915-1 standards in sample SEP01-FL. Consequently, the historic release was reported to the ECMC in Form 19 Document # 404244652, under Spill ID 491963. Soil that was potentially saturated with groundwater was encountered in the base of the PWV excavation during decommissioning activities. Soil samples were noted to be outside temperature range upon laboratory receipt; therefore, all laboratory-submitted decommissioning samples will be re-collected.

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):

Sampling was conducted as described in the Initial Action Summary of this Form 27, per the approved sampling plan in Initial Form 27 # 404069226. However, due to a laboratory error, the samples collected from the 5/13/2025 decommissioning event were processed outside of the allotted sample preservation temperatures.

Confirmation soil samples will be recollected and analyzed 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 will be 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):

Soil that was potentially saturated with groundwater was encountered at approximately five feet below ground surface in the base of the produced water vessel excavation. A groundwater sample was not able to be collected during initial decommissioning activities. A groundwater sample will be collected during the proposed supplemental site investigation (SSI) as described in this Form 27 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 tank battery decommissioning activities. Personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, were attached to a previous Form 27, under Document # 404243565.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 915-1 5
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 500

NA / ND

-- Highest concentration of TPH (mg/kg) 68
-- Highest concentration of SAR 6.86
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

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 05/13/25, three background soil samples were collected at depths ranging between 0 and 5 feet below ground surface (ft. bgs) from one discrete location (BKG01) adjacent to the tank battery and were analyzed for metals in soil per ECMC Table 915-1, pH, EC, SAR, and boron. However, due to background soil samples being received by the lab outside of the allotted sample preservation range, these samples will be omitted from future reports and will be recollected for analysis.

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?

A supplemental site investigation (SSI) will be completed to recollect all decommissioning soil samples, delineate organic exceedances observed during decommissioning, collect a groundwater sample, and collect additional background samples. Soil samples collected on 05/13/2025 during decommissioning activities were noted to be outside temperature preservation limits upon laboratory receipt; therefore, all lab-submitted decommissioning soil samples (AST01R and PWV01-N) will be recollected. To address the naphthalene and benzo(a)anthracene exceedances observed at SEP01-FL during decommissioning, soil borings (SEP01-FLR, SEP01-DLR, and SB01-SB03) will be advanced to obtain vertical and horizontal delineation of impacts. Additionally, a temporary monitoring well (BH01) will be advanced adjacent to the PWV01-B location to recollect the decommissioning sample and to collect a groundwater sample, if groundwater is encountered.

Concurrently, replacement background sample BKG01R and additional background samples (BKG02-BKG06) will be advanced to evaluate native material conditions onsite. Soil and groundwater samples will be collected and analyzed for full ECMC Table 915-1 constituents. Proposed soil boring locations are shown on the proposed site investigation map attached to this Form 27. 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.

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 recollect all decommissioning soil samples, delineate organic exceedances observed during decommissioning, collect a groundwater sample, and collect additional background samples. Soil samples collected on 05/13/2025 during decommissioning activities were noted to be outside temperature preservation limits upon laboratory receipt; therefore, all lab-submitted decommissioning soil samples (AST01R and PWV01-N) will be recollected. To address the naphthalene and benzo(a)anthracene exceedances observed at SEP01-FL during decommissioning, soil borings (SEP01-FLR, SEP01-DLR, and SB01-SB03) will be advanced to obtain vertical and horizontal delineation of impacts. Additionally, a temporary monitoring well (BH01) will be advanced adjacent to the PWV01-B location to recollect the decommissioning sample and to collect a groundwater sample, if groundwater is encountered. Concurrently with the SSI, additional background samples will be collected to evaluate native material conditions onsite. The SSI will be completed in accordance with the proposed implementation schedule, and the results will be submitted on a subsequent Form 27.

Soil Remediation Summary

In Situ

Ex Situ

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

- _____ 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.

Soil that was potentially saturated with groundwater was encountered during initial site decommissioning activities in the base of the produced water vessel excavation at approximately 5 feet below ground surface. A groundwater sample was not able to be collected during initial decommissioning activities. One temporary monitoring well (BH01) will be advanced in the vicinity of the observed groundwater in the produced water vessel excavation and converted into a temporary groundwater monitoring well to collect a sample.

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 Investigation 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 MWZZ 316714 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. 05/13/2025

Proposed date of completion of Reclamation. 09/18/2027

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. 01/14/2025

Actual Spill or Release date, or date of discovery. 06/16/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/13/2025

Proposed site investigation commencement. 03/18/2026

Proposed completion of site investigation. 03/18/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/18/2026

Proposed date of completion of Remediation. 03/18/2027

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 # 404243565. The updated proposed site investigation is tentatively scheduled for 03/18/26. 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 in response to the previously denied Form 27 Document # 404403626 for the NENE 15-6N-64W Speicher TB Loc (Rem # 39119), as well as to include an updated supplemental site investigation (SSI) proposal.

Due to a laboratory shipping error, soil samples collected on 05/13/2025 during decommissioning activities were noted to be outside temperature preservation limits upon receipt; therefore, all lab-submitted decommissioning soil samples will be recollected. In addition, due to an error in the results/reporting limits for selenium in all samples reported under DA72330, originally submitted to the ECMC in approved Form 27 Document # 404243565, an updated and revised laboratory report is attached to this Form 27 submittal, for transparency.

Consequently, an SSI will be completed to recollect all decommissioning soil samples, delineate organic exceedances observed during decommissioning, collect a groundwater sample, and collect additional background samples. Soil samples collected on 05/13/2025 during decommissioning activities were noted to be outside temperature preservation limits upon laboratory receipt; therefore, all lab-submitted decommissioning soil samples (AST01R and PWV01-N) will be recollected. To address the naphthalene and benzo(a)anthracene exceedances observed at SEP01-FL during decommissioning, soil borings (SEP01-FLR, SEP01-DLR, and SB01-SB03) will be advanced to obtain vertical and horizontal delineation of impacts. Additionally, a temporary monitoring well (BH01) will be advanced adjacent to the PWV01-B location to recollect the decommissioning sample and to collect a groundwater sample, if groundwater is encountered.

Concurrently, replacement background sample BKG01R and additional background samples (BKG02-BKG06) will be advanced to evaluate native material conditions onsite. Soil and groundwater samples will be collected and analyzed for full ECMC Table 915-1 constituents. The SSI will be completed in accordance with the attached site investigation plan and is tentatively scheduled to commence on 03/18/26, and will be summarized in a forthcoming Form 27 submittal.

Pursuant to 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: Samuel Anderson

Title: Environmental Consultant

Submit Date: 01/09/2026

Email: tas-chevron-5@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: Abdul Elnajdi

Date: 02/02/2026

Remediation Project Number: 39119

COA Type

Description

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.
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

404487924	FORM 27-SUPPLEMENTAL-SUBMITTED
404488792	LABORATORY ANALYTICAL REPORT
404488810	SITE INVESTIGATION PLAN

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)