

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:  
404536004

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 ECOM 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>	<b>Phone Numbers</b>
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>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 38413 Initial Form 27 Document #: 403987427

**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>WELL</u>	Facility ID: _____	API #: <u>123-23512</u>	County Name: <u>WELD</u>
Facility Name: <u>FOSS 6-33</u>	Latitude: <u>40.510070</u>	Longitude: <u>-104.487110</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>6</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-25138</u>	County Name: <u>WELD</u>
Facility Name: <u>FOSS 6-35</u>	Latitude: <u>40.511337</u>	Longitude: <u>-104.484180</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>6</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: SPILL OR RELEASE Facility ID: 491772 API #: County Name: WELD  
Facility Name: Foss 6-33 (FL02-01) Latitude: 40.508995 Longitude: -104.488284  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: SWSW Sec: 6 Twp: 6N Range: 63W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 492001 API #: County Name: WELD  
Facility Name: Foss 6-35 Latitude: 40.509464 Longitude: -104.487722  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: SWSW Sec: 6 Twp: 6N Range: 63W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 492002 API #: County Name: WELD  
Facility Name: Foss 6-33 (FL02R-W) Latitude: 40.510063 Longitude: -104.487119  
\*\* correct Lat/Long if needed: Latitude: Longitude:  
QtrQtr: SWSW Sec: 6 Twp: 6n Range: 63W 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? Yes 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**

Within Mule Deer Severe Winter Range HPH  
Within Pronghorn Winter Concentration Area HPH  
Residential 0.25mi NW

# 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	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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the Foss 06-33 flowline and Foss 06-35 wellhead and flowline. The Foss 06-35 wellhead was cut and capped per ECMC rules on 01/29/2025. Approximately 1514' of the Foss 06-35 flowline was removed on 03/12/2025. Approximately 555' of the Foss 06-33 flowline was removed on 03/12/2025. The ECMC was notified on Form 44, Document #404203088 of the full removal of both flowlines.

## 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 ):

A grab soil sample was collected at the base of the former wellhead excavation, and four soil samples were field screened at the N-E-S-W sidewalls of the wellhead. Soil samples were taken along the flowline at any points of material change/hammer unions, directional changes, as well as at the bell holes on either side of a waterway, and the terminuses at the wellhead and separator. Soil samples collected were analyzed by a certified laboratory for the full extent of ECMC Table 915-1. 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.

### 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 wellhead and flowline areas 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

NA / ND

Number of soil samples collected

ND Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 3 -- Highest concentration of SAR 5.95  
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No  
 Approximate areal extent (square feet) 300 Vertical Extent > 915-1 (in feet) 4

**Groundwater**

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l) \_\_\_\_\_  
 Was extent of groundwater contaminated delineated? Yes Highest concentration of Toluene (µg/l) \_\_\_\_\_  
 Depth to groundwater (below ground surface, in feet) \_\_\_\_\_ Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
 Number of groundwater monitoring wells installed \_\_\_\_\_ Highest concentration of Xylene (µg/l) \_\_\_\_\_  
 Number of groundwater samples exceeding 915-1 \_\_\_\_\_ 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?

6 background samples were collected during flowline decommissioning at the adjacent Foss 06-34 Flowline (REM # 39225) on 03/10/25. These background samples were reported under Site Investigation and Remediation Workplan (Doc. # 404217970) which has been "DENIED" due to samples being analyzed out of hold time by the laboratory. During site investigation activities, 15 additional background soil samples were collected on 1/28/26 from five borings (BKG04-BKG08) at depths ranging approximately 2-4 ft bgs. All background samples collected were submitted for ECMC Table 915-1 inorganic and metal analysis. The maximum background concentration with the 1.25x multiplier for arsenic was observed to be 7.01 mg/kg. The maximum background concentration for pH and SAR were observed to be 8.91 and 6.7700 respectively. The analyzed samples were within ECMC Table 915-1 standards/maximum background concentrations except for pH and SAR in sample WH01@6'.

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?

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during decommissioning will be removed through remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full ECMC Table 915-1 analysis. Concurrently with the remedial excavation, additional background samples (5+) will be collected to determine if the pH and SAR exceedances are attributable to native soil conditions at the site. Background samples will be analyzed for inorganics and metals in soil per ECMC Table 915-1. The proposed sample locations are attached within approved form 27 (Doc.#404394112).

**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 exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during the decommissioning will be removed through remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full Table 915-1 constituents.

**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.

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during decommissioning will be removed through remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full ECMC Table 915-1 analysis. Concurrently with the remedial excavation, additional background samples (5+) will be collected to determine if the pH and SAR exceedances are attributable to native soil conditions at the site. Background samples will be analyzed for inorganics and metals in soil per ECMC Table 915-1. The proposed sample locations are attached within approved form 27 (Doc.#404394112).

**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.

Groundwater was not encountered during initial decommissioning activities.

# REMEDATION 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 Background sample summary, SSMR 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: \_\_\_\_\_

# REMEDATION COMPLETION REPORT

## REMEDATION 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. 01/29/2025

Proposed date of completion of Reclamation. 06/30/2028

## 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. 11/05/2024

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/29/2025

Proposed site investigation commencement. 03/12/2025

Proposed completion of site investigation. 06/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/30/2026

Proposed date of completion of Remediation. 09/30/2026

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:

\_\_\_\_\_

**OPERATOR COMMENT**

This Form 27 is being submitted to provide a 1Q 2026 update and background sample summary for the Foss 06-33 flowline and Foss 06-35 flowline and wellhead (REM #38413). 15 background soil samples were collected on 1/28/26 from five borings (BKG04-BKG08) at depths ranging approximately 2-4 ft bgs. All background samples collected were submitted for ECMC Table 915-1 inorganic and metal analysis. The maximum background concentration with the 1.25x multiplier for arsenic was observed to be 7.01 mg/kg. The maximum background concentration for pH and SAR were observed to be 8.91 and 6.7700 respectively. The analyzed samples were within ECMC Table 915-1 standards/maximum background concentrations except for pH (8.91 standard units) and SAR (6.7700 standard units) in sample WH01@6'. The analytical results and data packet are attached to this form.

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during decommissioning will be removed through remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full ECMC Table 915-1 analysis. Concurrently with the remedial excavation, additional background samples (5+) will be collected to determine if the pH and SAR exceedances are attributable to native soil conditions at the site. Background samples will be analyzed for inorganics and metals in soil per ECMC Table 915-1. The proposed sample locations are attached within approved form 27 (Doc.#404394112).

In response to ECMC comment dated 1/16/2026 (Doc. #404497425), background sampling was conducted on 1/28/2026 and a remedial excavation will be completed. A qualified excavation crew is not immediately available but is expected to commence the work in 1Q 2026. Work will be conducted in compliance with previously approved work plans and the 900 Series Rules. The Operator is prioritizing this work, and the ECMC will be notified of any future schedule updates. A remedial excavation map showing the proposed work is attached to this current form.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the proposed SSI & remedial excavations will be reported within 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: Scott Williamson

Title: Environmental Consultant

Submit Date: \_\_\_\_\_

Email: NorthernColorado@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: 38413

**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**

404540738	SITE INVESTIGATION REPORT
404540739	ANALYTICAL RESULTS

Total Attach: 2 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

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

Total: 0 comment(s)