

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404520136

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>Dan Peterson</u>	Email: <u>rbueuf27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28080 Initial Form 27 Document #: 403340286

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>481576</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SWSW 29-6N-64W Uhrich TB Loc</u>	Latitude: <u>40.449914</u>	Longitude: <u>-104.581087</u>	
	** correct Lat/Long if needed: Latitude: <u>40.449984</u>	Longitude: <u>-104.580838</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>29</u>	Twps: <u>6N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

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 Wetlands 50ft SW
NA

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
No	GROUNDWATER	NA	Laboratory analysis and field screening, if encountered
Yes	SOILS	Refer to Tables and Figures	Laboratory 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.

A site investigation was conducted pursuant to ECMC Rule 911 at the Uhrich 19-29,1,14-29 Facility and Tank Battery location. On 04/28/2023 & 05/01/2023, the tank battery was decommissioned in accordance with ECMC rules.

The flowline riser of the southern separator (SEP01) was sampled during the Uhrich 14-29 flowline abandonment (Rem #22146, API #05-123-21811). On 03/24/2022, a sample was collected beneath the flowline riser of the southernmost separator (FL-SS-01@4') was collected by a former consultant. As part of Chevron's Data Integrity review for projects this sample was recollected as sample FL-SS-01R@4-5' during the 08/21/2025 site assessment in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. The historical release identified at the riser is being managed under Rem #22146.

Due to field constraints, soil samples were not collected from the risers for the flowline and dumpline of the second separator (SEP02-FL and SEP02-DL). Additional site investigation activities were completed on 08/21/2025 to collect these soil samples as per approved sampling map attached to the Form 27 Initial (ECMC Document #403340286).

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):

Laboratory soil samples were collected from the partially-buried produced water vessel excavation (FS01@6') and field screening samples were taken from the N, W, S, & E sidewalls (SS01@2.5' through SS04@2.5'). The screening sample with the highest PID (SS03@2.5') was collected for laboratory analysis from the S sidewall. Lab samples were also collected beneath the above ground storage tank (AST01@0.5') and beneath the the separator risers for the dumpline (SEP01-DL@3'). Additionally, field screening samples were collected beneath the flares (FLARE01@0.5' & FLARE02@0.5') and meter houses (MH01@0.5' & MH02@0.5'). Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

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 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 is required. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to a previous Form 27 (ECMC Document # 403704178).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 24.51

-- Highest concentration of SAR 0.475

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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 02/05/2025, twenty background soil samples were collected from native material adjacent to the nearby Hoffner 32-32 Wellhead (Rem # 25848; Reported under ECMC Doc # 404246025). During Site Investigation activities on 08/21/2025, twelve background soil samples were collected from four discrete locations (BKG01-BKG04) adjacent to the tank battery 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 1 to 14 feet below ground surface (ft bgs). All background samples were collected from similar depths in the Otero sandy loam, with similar land use. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and cadmium were calculated to be 12.5 mg/kg, 408 mg/kg, and 0.550 mg/kg, respectively. All arsenic, barium, and cadmium concentrations observed during decommissioning and SSI activities were below 1.25x the maximum 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?

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.

On 08/21/2025, a supplemental site investigation (SSI) was completed to resample initial decommissioning locations for analysis of full ECMC Table 915-1 contaminants of concern (FS01R@6-7', SS03R@2-3', AST01R@0.5-1.5', SEP01-DL-R@3-4', & FL-SS-01R@4-5') and to collect additional decommissioning samples at the location of the flowline and dumpline risers of the northernmost separator (SEP02-FL-R@4-5' & SEP02-DL-R@3-4'). Analytical results indicated that organic compound concentrations, pH, EC, SAR, and boron were in compliance with the applicable ECMC regulatory standards in all soil sample locations. Metals concentrations in exceedance of Table 915-1 ECMC limits (arsenic, barium, and cadmium) were below 1.25x the maximum background levels of Uhrich 19-29, 1, 14-29 tank battery background soil samples and nearby Hoffner 32-32 wellhead (Rem # 25848) background soil samples. No additional investigation is required at this time.

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 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 Comprehensive Soil Data Report and No Further Action (NFA) Request _____

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: \$ 0 _____

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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. 03/24/2022

Proposed date of completion of Reclamation. 08/22/2026

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. 03/02/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/24/2022

Proposed site investigation commencement. 08/21/2025

Proposed completion of site investigation. 08/21/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/21/2025

Proposed date of completion of Remediation. 08/21/2025

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:

No additional investigation is required at this time. The proposed completion of remediation date has been adjusted to the SSI completion date.

OPERATOR COMMENT

This Form is being submitted to present comprehensive soil data and request a no further action (NFA) designation for the Uhrich 19-29, 1, 14-2 Tank Battery location (Rem #28080).

On 04/28/2023 & 05/01/2023, the tank battery was decommissioned in accordance with ECMC rules. Discrete soil samples were collected from beneath the former facility infrastructure as described in the approved Form 27-Initial (ECMC Document #403340286).

On 03/24/2022, a sample was collected beneath the flowline riser of the southernmost separator (FL-SS-01@4') by a former consultant during the Uhrich 14-29 flowline abandonment (Rem #22146, API #05-123-21811). As part of Chevrons Data Integrity review for projects this sample was recollected as sample FL-SS-01R@4-5' during the 08/21/2025 site assessment in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. The historical release identified at the riser is being managed under Rem #22146. Due to field constraints, soil samples were not collected from the risers for the flowline and dumpline of the northernmost separator (SEP02-FL and SEP02-DL).

On 08/21/2025, a supplemental site investigation (SSI) was also completed to further investigate initial decommissioning sample locations for analysis of full ECMC Table 915-1 contaminants of concern and to collect additional samples at the location of the flowline and dumpline risers of the northernmost separator.

On 02/05/2025, twenty background soil samples were collected from native material adjacent to the nearby Hoffner 32-32 Wellhead (Rem # 25848; reported under ECMC Doc #404246025). During Site Investigation activities on 08/21/2025, twelve background soil samples were collected from four discrete locations (BKG01-BKG04) adjacent to the tank battery and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Samples were collected from depths ranging between 1 to 14 feet below ground surface (ft bgs). All background samples were collected from similar depths in the Otero sandy loam, with similar land use. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and cadmium were calculated to be 12.5 mg/kg, 408 mg/kg, and 0.550 mg/kg, respectively. All arsenic, barium, and cadmium concentrations observed during decommissioning and SSI activities were below 1.25x the maximum background levels.

Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical reports from subsequent modification by anyone outside the lab, which resulted in the lab reissuing the original reports with the additional protections (Summit #2304653, #2305018, & #2502070). The Reissued Reports were received directly from the lab on April 9, 10, and 24, 2025, which includes the application of a Digital ID/Verified Certification (lock) to support reissuance. The metadata associated with the Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Reports are attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information.

Results from the August 2025 SSI conclusively demonstrate that all organic and inorganic compound concentrations are below ECMC table 915-1 standards or native background levels. As such, no additional investigation is required at this time. Noble requests an NFA designation for this site.

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

Signed: Loren Bohannon

Title: Environmental Consultant

Submit Date: _____

Email: tas-chevron-3@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: _____

Date: _____

Remediation Project Number: 28080

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
404520583	LABORATORY ANALYTICAL REPORT
404520589	LABORATORY ANALYTICAL REPORT
404520590	LABORATORY ANALYTICAL REPORT
404533074	LABORATORY ANALYTICAL REPORT
404557706	SITE INVESTIGATION REPORT
404557725	LABORATORY ANALYTICAL REPORT

Total Attach: 6 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)