

State of Colorado  
Energy & Carbon Management Commission

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404557947  
Receive Date:  
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Report taken by:  
Krystal Heibel

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECMC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 304-5000
City: DENVER State: CO Zip: 80202		Mobile: ( )
Contact Person: Erica Zuniga	Email: RBUEUF27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 26659 Initial Form 27 Document #: 402988596

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: PIT	Facility ID: 110642	API #: _____	County Name: LOGAN
Facility Name: SMART A	Latitude: 40.477780	Longitude: -103.300896	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 21	Twp: 6N	Range: 53W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT	Facility ID: 110643	API #: _____	County Name: LOGAN
Facility Name: SMART A	Latitude: 40.477780	Longitude: -103.300896	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 21	Twp: 6N	Range: 53W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT Facility ID: 110644 API #: \_\_\_\_\_ County Name: LOGAN  
 Facility Name: SMART A Latitude: 40.477780 Longitude: -103.300896  
 \*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
 QtrQtr: NWNE Sec: 21 Twp: 6N Range: 53W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 484268 API #: \_\_\_\_\_ County Name: LOGAN  
 Facility Name: Smart A Latitude: 40.477667 Longitude: -103.301672  
 \*\* correct Lat/Long if needed: Latitude: 40.477556 Longitude: -103.301567  
 QtrQtr: NWNE Sec: 21 Twp: 6N Range: 53W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SC 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**

Platte Ditch - currently located approximately 680' NW of proposed assessment area - rerouted between 1998 and 2004.  
 Riverine "wetlands" - plots as of 1975 adjacent to the assessment area. Wetlands have since been removed and are no longer present at the location - see 2021 aerial.  
 HPH - Yes - Mule Deer Severe Winter Range - Consult will be Colorado Parks and Wildlife will be completed as needed.  
 Municipality - No  
 Livestock - ~1,100' NW  
 Occupied Building - Home/Farm - ~995' NW  
 10 water wells identified within 1/2 mile. Permit #38707 (stock) - located ~950' NW; Permit #196214 (domestic) - located ~3360' 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	TBA	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 Smart A historical pits associated with the plugged and abandoned wellheads. Five (5) soil borings were advanced within the footprint of the former pits (3) and within the footprint of the former berms (2). Nineteen (19) soil samples were analyzed Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1 compounds.

Six (6) of the 19 samples, collected from borings SB-01, SB-02 and SB-06 exceeded Table 915-1 standards.

## 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 ):

### Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

### 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 ):

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 19

-- Highest concentration of TPH (mg/kg) 10800

Number of soil samples exceeding 915-1 6 -- Highest concentration of SAR 98.1  
Was the areal and vertical extent of soil contamination delineated? Yes BTEX > 915-1 Yes  
Approximate areal extent (square feet) 2800 Vertical Extent > 915-1 (in feet) 20

**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?  

Previously, sixteen (16) background samples were collected from 4 separate soil borings from similar lithographic soil for Table 915-1 metals, pH, SAR and boron.
- 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?  

Required additional investigation, information, reports, and addressing of COAs will be provided in Supplemental Form 27 submittals.

**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.

Operator will conduct supplemental source mass removal (SSMR) via mechanical excavation to address the residual soil impacts identified at the Site.

**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.

Laboratory analysis from 19 soil samples collected from the Smart A Site identified VOCs, SVOCs and SAR that exceeded Table 915-1 standards at sample locations SB-01 @ 2.5-5', SB-01 @ 5-7.5', SB-02 @ 2.5-5', SB-02 @ 5-7.5', SB-06 @ 0-2.5' and SB-06 @ 2.5-5'.

These exceedances will be removed through SSMR of an approximately X feet x Y feet and 10 feet deep (Z cubic feet) excavation. The proposed excavation plan is depicted on the attached figure. Excavated soils will be field screened with a PID and visual/olfactory senses to determine the extent of the excavation boundary. Post-excavation confirmatory samples will be collected from the excavation, one every 40 linear feet for sidewall, and one every 500 sq feet of floor (a minimum of five grab soil samples). If groundwater is encountered, a grab groundwater sample will be collected.

Excavation and confirmatory sampling will continue until Table 915-1 standards are met. All samples collected will be analyzed for full ECMC Table 915-1 constituents. The analytical results of the remedial excavation will be submitted on a subsequent Form 27.

SSMR activities at the site are currently being scheduled to occur by the end of second quarter 2025. NFA will be considered when soil and/or groundwater (if encountered) concentrations are in compliance with ECMC Table 915-1 standards.

**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.

If groundwater is encountered during remediation activities a grab groundwater will be collected and analyzed for all organic compounds per ECMC Table 915-1. Additional monitoring will be proposed in a supplemental 27, as needed.

# 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 \_\_\_\_\_ Timeline Update

## 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. 07/31/2025

Proposed date of completion of Reclamation. 03/25/2029

## 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. 04/13/2023

Actual Spill or Release date, or date of discovery. 04/12/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/22/2023

Proposed site investigation commencement. 12/22/2022

Proposed completion of site investigation. 07/31/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/31/2026

Proposed date of completion of Remediation. 12/31/2026

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

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

Basis for change in implementation schedule:

The Operator has conducted a detailed data screening of historical site investigation analytical data for this REM collected by the prior consultant (Eagle Environmental). Given the meticulous nature of the data screening and considering the impact the screening results could have on the project strategy/life cycle, all site activities and associated compliance reporting was temporarily put on hold for this facility. Additional details/next steps will be provided in the subsequent Supplemental Form 27 submittal which is anticipated for submittal to ECMC within 90-days, post regulatory approval of this Timeline Update.

## OPERATOR COMMENT

This form is being submitted to serve as a Timeline Update.

The Operator has conducted a detailed data screening of historical site investigation analytical data for this REM collected by the prior consultant (Eagle Environmental). This review included review of laboratory analytical data reports and investigation reporting materials compared to corresponding encrypted analytical reports issued by the laboratory. Completion of this data screening was necessary in order to determine if analytical results generated by the prior consultant could be utilized to inform the project's remediation strategy and development of next steps. Given the meticulous nature of the data screening and considering the impact the screening results could have on the project strategy/life cycle, all site activities and associated compliance reporting was temporarily put on hold for this facility. Therefore, this Timeline Update serves to notify ECMC of the following:

- Historical site investigation activities/results have been verified by the data screening and can be utilized for technical decision making purposes.
- The Operator has reviewed historical data to inform the next steps (i.e., addressing prior COAs, scheduling additional site investigation to collect delineation and background samples, conducting remedial actions, or compiling forms for NFA consideration).

Additional details/next steps will be provided in the subsequent Supplemental Form 27 submittal which is anticipated for submittal to ECMC within 90-days, post regulatory approval of this Timeline Update.

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

Signed: Jessica Robertson

Title: Environmental Consultant

Submit Date: 02/26/2026

Email: cvxform27@erm.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: 26659

### COA Type

### Description

<u>COA Type</u>	<u>Description</u>
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

<u>Att Doc Num</u>	<u>Name</u>
404557947	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location.</p> <p>Per Rule 912.a.(1-2): Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and may request expedited review if necessary.</p> <p>Operator shall conduct work in compliance with approved workplans and the 900 Series Rules. Operator shall provide a replacement form documenting investigation and clean up of these impacts; if a form providing this information is in process no replacement Form is due. If Operator is requesting a schedule change under Rule 913.d.(2) Operator shall attach adequate justification for the request. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.</p>	03/03/2026

Total: 1 comment(s)