

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:  
404554543  
Receive Date:  
03/10/2026

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: NOBLE ENERGY INC   | Operator No: 100322         | Phone Numbers<br>Phone: (970) 304-5000<br>Mobile: ( ) |
| Address: 1099 18TH STREET SUITE 1500 |                             |   |
| City: DENVER                         | State: CO                   | Zip: 80202  |
| Contact Person: Dan Peterson         | Email: RBUEUF27@chevron.com |   |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20770 Initial Form 27 Document #: 402864848

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: WELL                            | Facility ID: _____  | API #: 123-17430       | County Name: WELD                          |
| Facility Name: BAKER STATE B 36-12             | Latitude: 40.354080 | Longitude: -104.504900 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NWSW                                   | Sec: 36             | Twp: 5N                | Range: 64W Meridian: 6 Sensitive Area? Yes |

|  |                     |                        |  |
|--|---------------------|------------------------|--|
| Facility Type: SPILL OR RELEASE                | Facility ID: 482960 | API #: _____           | County Name: WELD                          |
| Facility Name: Baker St B 36-12                | Latitude: 40.354080 | Longitude: -104.504900 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NWSW                                   | Sec: 36             | Twp: 5N                | Range: 64W Meridian: 6 Sensitive Area? Yes |

## SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Crop Land

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**

Residential structures are present approximately 0.10 miles west, and 0.19 and 0.24 miles southeast of the Location. Farm structures are located approximately 0.15, 0.17, and 0.18 miles southwest, 0.14 miles southeast, and 0.10 miles west of the Location. Latham Ditch is present 0.22 miles north. Riverine habitat is 0.13 miles southwest of the Location. Division of Water Resources (DWR) well permit 98268-VE is 0.24 miles southwest of the Location; the permit type is currently listed as "unknown".

# 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                          | Field-Screening and Laboratory Analysis, if Encountered |
| Yes          | SOILS          | Refer to Tables and Figures | Field-Screening and Laboratory Analysis                 |

## 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 ECOM Rule 911 site investigations were conducted pertaining to the BAKER STATE B #36-12 wellhead cut and cap and flowline removal. Approximately 425 feet of flowline was removed on December 5, 2022, and a portion of the flowline was abandoned. The ECOM was notified on Form 44 Document 403346651. On August 30, 2022, five soil samples were collected from the wellhead excavation: one from the base and one from each associated sidewall. The samples were submitted for analysis of ECOM Table 915-1 organic and SSR constituents. The eastern sidewall sample (WH-SS-02) was also submitted for analysis of Table 915-1 metals. Laboratory results reported exceedances of 1-methylnaphthalene, arsenic, and barium. These samples have been included in Chevron's data integrity review and will be recharacterized in accordance with the approved Form 27 investigation plan. As the wellhead samples from August 30, 2022, were deemed to be invalid, they will not be used for site compliance and will not be included in subsequent reporting. These results were reported in Document 403712825.

On November 28 and 30, 2022, a previous consultant conducted initial flowline characterization sampling. Two soil samples were collected from the flowline terminuses: one at the wellhead (FL01) and one at the separator (SEP FL). Samples were submitted for analysis of Table 915-1 organics and SSRs. Laboratory results were compliant with all applicable standards. See Document 403712825 for details. Flowline assessment will continue to be addressed under Remediation Project 20766 as approved in Document 403780528.

## 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 ):

Additional soil samples will be collected to characterize material at the former wellhead and flowline previously sampled during initial investigation activities and to delineate the 1-methylnaphthalene exceedance at WH-SS-02. Additionally, a flowline characterization sample will be collected from the midpoint of the removed section of flowline. Soil samples will be submitted for analysis of all Table 915-1 soil constituents. Background samples will be collected to further establish the range of values for naturally occurring inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further delineation may be completed at the wellhead and flowline site investigation areas to address elevated EC, arsenic, barium, lead, nickel, and selenium. A supplemental site investigation plan (SSIP) is attached with proposed sample locations.

### Proposed Groundwater Sampling

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

No groundwater has been encountered during site investigation activities. If groundwater is encountered, a grab groundwater sample will be collected and analyzed for full 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 ):

Field personnel field-screened all disturbance areas using visual and olfactory senses to determine if laboratory analysis was required.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 8

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 100

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_

-- Highest concentration of SAR 11.2

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 7

### 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 January 23, 2025, five background samples were collected by a previous consultant from a depth of 5 feet bgs. The background samples were submitted for analysis of all Table 915-1 inorganics (metal and SSR constituents). The maximum pH, EC, and SAR values are 8.4, 4.03 mmhos/cm, and 11.6, respectively. The maximum calculated background concentrations, with a 1.25 times multiplier applied for the following metals are: 3.01 mg/kg (arsenic), 168 mg/kg (barium), 12.5 mg/kg (lead), and 4.03 mg/kg (nickel).

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?

Additional soil samples will be collected to characterize material at the former wellhead and flowline previously sampled during initial investigation activities and to confirm delineation the 1-methylnaphthalene exceedance at WH-SS-02. Additionally, a flowline characterization sample will be collected from the midpoint of the removed section of flowline. The rest of the flowline, that was abandoned in place, will continue to be addressed under Remediation Project 20766 as approved in Document 403780528. Soil samples will be submitted for analysis of all Table 915-1 soil constituents of concern. Five background samples will be collected to further establish the range of values for naturally occurring inorganic constituents in the project area. See the attached SSIP for details.

## 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.

Site investigation efforts are still underway for this project. When investigation efforts have concluded, if source removal is deemed to be necessary, a removal summary will be provided.

### 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.

Site investigation and delineation efforts are still underway for this project. When investigation efforts have concluded, if remediation is deemed to be necessary, a remedial approach will be proposed, and subsequent efforts and results will be reported here.

**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 decommissioning efforts or subsequent 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 Quarterly Update and SSIP

## 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? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be completed 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. 12/31/2026

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

## IMPLEMENTATION SCHEDULE

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

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. 09/08/2021

Actual Spill or Release date, or date of discovery. 09/20/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/30/2022

Proposed site investigation commencement. 11/25/2021

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. 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 implementation schedule has been updated to reflect the current status of site investigation efforts and anticipated dates for completion. Remediation and site investigation activities are now under the direction of Confluence Compliance Companies, LLC (Confluence). Additional site investigation to obtain valid point of compliance data for the wellhead and flowline investigation areas and to further characterize native soil conditions is tentatively scheduled to be completed by the end of the second quarter of 2026, and results will be reported in a subsequent Form 27.

**OPERATOR COMMENT**

This form has been submitted as a replacement form in response to ECMC's denial of Form 27 dated February 3, 2026 (Document 404523041), to return the BAKER STATE B#36-12 (Remediation Project 20770) to compliance with the quarterly reporting requirement, to notify the ECMC of a change in the reporting consultant, and to propose additional investigation. Remediation and site investigation, previously directed by a former consultant, is now under the direction of Confluence. Additional soil samples are proposed to obtain valid point-of-compliance samples at the previous investigation areas and to confirm delineation of the 1-methylnaphthalene exceedance at WH-SS-02. Additionally, a flowline characterization sample is proposed to be collected from the midpoint of the removed section of flowline. Soil samples will be submitted for analysis of all Table 915-1 soil constituents. Five background samples will also be collected to further establish the range of values for naturally occurring inorganic constituents in the project area.

In response to the general comment included in denied Form 27 Document 404523041, which stated, "ECMC has denied this form as the proposed sampling plan does not adequately characterize the flowline nor comply with the approved sampling plan from the initial Form 27", the flowline assessment has been conducted and will continue to be addressed under Remediation Project 20766 as approved in Document 403780528.

On October 28, 2024, additional soil sampling was completed to delineate exceedances at the wellhead. Five soil borings were completed around the former wellhead, and up to two samples were collected from each boring. Samples were submitted for analysis of all Table 915-1 constituents. Laboratory results reported exceedances of EC, SAR, arsenic, barium, lead, nickel, and selenium. These samples have been included in Chevron's data integrity review and will be recharacterized in accordance with the approved Form 27 investigation plan. As the samples from October 28, 2024, were deemed to be invalid, they will not be used for site compliance and will not be included in subsequent reporting. These results were reported in Document 4034077042.

On January 23, 2025, a previous consultant conducted sampling to obtain valid point of compliance data at the wellhead. Eight samples were collected from four soil borings (WH-02-N, WH-02-E, WH-02-S, and WH-02-W). Soil samples were submitted for analysis of all Table 915-1 constituents. Laboratory results reported exceedances of pH, SAR, arsenic, barium, lead, and selenium. Spatial data indicate that sample locations do not align with the wellhead location, and therefore, these samples will not be used for site compliance. Five background samples were collected and submitted for analysis of Table 915-1 inorganics. Laboratory results recorded elevated native values of pH, SAR, arsenic, barium, lead, and selenium. See Document 404298914 for details.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. Confluence plans to conduct the proposed SSI in accordance with the proposed implementation schedule and the SSIP attached to this form submittal. The results will be submitted in 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: Holly Tignac

Title: Project Scientist

Submit Date: 03/10/2026

Email: CVX-REMS@confluence-cc.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: 03/10/2026

Remediation Project Number: 20770

**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**

|           |  |
|-----------|--|
| 404554543 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 404554596 | SITE INVESTIGATION PLAN                          |
| 404574045 | FORM 27-SUPPLEMENTAL-SUBMITTED                   |

Total Attach: 3 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

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

Total: 0 comment(s)