

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:
404421338
Receive Date:
11/19/2025

Report taken by:
Grace Rollins

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>	Phone Numbers Phone: <u>(970) 304-5000</u> Mobile: <u>()</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Dan Peterson</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41603 Initial Form 27 Document #: 404228713

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>329958</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-GUTTERSEN-63N64W 3NWSE</u>	Latitude: <u>40.252630</u>	Longitude: <u>-104.534770</u>	
** correct Lat/Long if needed: Latitude: <u>40.252535</u>		Longitude: <u>-104.534521</u>	
QtrQtr: <u>NWSE</u>	Sec: <u>3</u>	Twp: <u>3N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>491272</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR Gutteresen-63N64W 3NWSE</u>	Latitude: <u>40.252665</u>	Longitude: <u>-104.534282</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>3</u>	Twp: <u>3N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: SPILL OR RELEASE Facility ID: 491273 API #: County Name: WELD
Facility Name: HSR Guttersen-63N64W 3NWSE Latitude: 40.252464 Longitude: -104.534532
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NWSE Sec: 3 Twp: 3N Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 491274 API #: County Name: WELD
Facility Name: HSR Guttersen-63N64W 3NWSE Latitude: 40.252460 Longitude: -104.534492
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NWSE Sec: 3 Twp: 3N Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland

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

Freshwater Emergent Wetland 0.14mi SW

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.

A site investigation was conducted pursuant to ECMC Rule 911 at the HSR Gutersent3N-R64W-S3 L01 Facility and Tank Battery location. The tank battery was decommissioned on 8/25/2025, and samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), and dumpline(s) of any separator(s).

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):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), at the risers for the flowline (s) and dumpline(s) of any separator(s). In addition, the on-site dump lines located between the separator and tank battery were removed by pulling from either end. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected 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 screen all disturbed areas using visual and olfactory senses. Additionally, discrete soil samples were collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 4

ND Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 2 -- Highest concentration of SAR 1.27

Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No

Approximate areal extent (square feet) 200 Vertical Extent > 915-1 (in feet) 3

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?

Between 08/25/2025 & 08/26/2025, eleven (11) background samples were collected from five (5) discrete locations (BKG01-05) adjacent to the facility and were analyzed for ECMC Table 915-1 inorganic and metal constituents. Background soil samples were collected from depths ranging between 0.5 feet to 3 feet below ground surface (ft bgs). The maximum background concentrations for pH was observed to be 8.69. The maximum background concentrations for arsenic including the additional 1.25 multiplier was reported at 3.85 mg/kg. The analyzed samples were within ECMC Table 915-1 standards/maximum background levels except for pH in soil sample locations AST01@0.5' & SEP01-DL@3'.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

A Supplemental Site Investigation (SSI) will be conducted to vertically and horizontally delineate the pH exceedance identified at sample locations AST01@0.5' & SEP01-DL@3'. The collected samples will be submitted for Full Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and analyzed for metals and inorganics in soil per ECMC Table 915-1 in order to determine if the observed pH exceedances are attributed to native conditions at the site. See attached map depicting the proposed SSI.

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.

In relation to the Form 19 (Doc. #404330892); On 08/25/2025, the potential presence of impacted material(s) was identified via high PID readings during decommissioning activities at the HSR Gutteresen-63N64W 3NWSE facility, soil samples SEP01-FLR@3' & SEP01-DL@3'. Soil samples were collected to determine whether any constituents were in excess of Table 915-1 standards. All sample locations sent for laboratory analysis reported no exceedances of Table 915-1 organic constituents. Final analytical results of soil sampling confirmed the suspected spill did not occur and was below Rule 912.a.(5) reporting thresholds.

In relation to the Form 19 (Doc. #404331131); On 08/25/2025, the potential presence of impacted material(s) was identified via staining and high PID readings during decommissioning activities at the HSR Gutteresen-63N64W 3NWSE facility, soil sample AST01@0.5'. Soil samples were collected to determine whether any constituents were in excess of Table 915-1 standards. All sample locations sent for laboratory analysis reported no exceedances of Table 915-1 organic constituents. Final analytical results of soil sampling confirmed the suspected spill did not occur and was below Rule 912.a.(5) reporting thresholds.

In relation to the Form 19 (Doc. #404331271); On 08/25/2025, the potential presence of impacted material(s) was identified via high PID readings during decommissioning activities at the HSR Gutteresen-63N64W 3NWSE facility, soil samples PWV01@5' & PWV01-SS03@4'. Soil samples were collected to determine whether any constituents were in excess of Table 915-1 standards. All sample locations sent for laboratory analysis reported no exceedances of Table 915-1 organic constituents. Final analytical results of soil sampling confirmed the suspected spill did not occur and was below Rule 912.a.(5) reporting thresholds.

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.

A Supplemental Site Investigation (SSI) will be conducted to vertically and horizontally delineate the pH exceedance identified at sample locations AST01@0.5' & SEP01-DL@3'. The collected samples will be submitted for Full Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and analyzed for metals and inorganics in soil per ECMC Table 915-1 in order to determine if the observed pH exceedances are attributed to native conditions at the site. See attached map depicting the proposed SSI.

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.

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, Decommissioning Sample Summary, 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:

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. 08/25/2025

Proposed date of completion of Reclamation. 09/30/2028

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. 05/29/2025

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/25/2025

Proposed site investigation commencement. 06/27/2025

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:

The implementation schedule has been changed due to the completion of decommissioning of the HSR Gutterson T3N-R64W-S3 L01 Facility and Tank Battery location, and the necessity for supplemental site investigation (SSI) adjacent to the site. The proposed SSI is tentatively scheduled for completion by the end of 2Q 2026.

OPERATOR COMMENT

This Form 27 is being submitted to provide a 4Q 2025 update, decommissioning sampling summary and to propose supplemental investigation for the HSR GuttersenT3N-R64W-S3 L01 Facility and Tank Battery location.

On 08/25/2025, the tank battery was decommissioned and samples were collected from the produced water vessel excavation, beneath the ground oil tank, and dumpline(s) of any separator(s). Upon receipt of final analytical results, ECMC Table 915-1 exceedances were observed in soil sample locations AST01@0.5' & SEP01-DL@3' for pH (5.23 and 5.90, respectively). A summary of decommissioning activities and the associated laboratory results are attached.

A Supplemental Site Investigation (SSI) will be conducted to vertically and horizontally delineate the pH exceedance identified at sample locations AST01@0.5' & SEP01-DL@3'. The collected samples will be submitted for Full Table 915-1 analysis. Concurrently with the SSI, additional background soil samples (5+) will be collected and analyzed for metals and inorganics in soil per ECMC Table 915-1 in order to determine if the observed pH exceedances are attributed to native conditions at the site. See attached map depicting the proposed SSI.

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 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: 11/19/2025

Email: NorthernColoradoPM@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: Grace Rollins

Date: 03/19/2026

Remediation Project Number: 41603

COA Type

Description

	Pursuant to Rule 913.d, Operator will adhere to the proposed schedule. Any deviation from the schedule must be approved by the Director in writing on a Form 27 Supplemental Report.
	Operator has reported that they encountered impacted soils during the onsite excavation activities. These soils are required to be treated as Investigation-Derived Waste in accordance with 913.b.3. and must be stored, handled, transported, treated, recycled, or disposed of in accordance with ECMC rules. More specifically these soils are not allowed to be placed back into the excavation to prevent adverse environmental impacts.
2 COAs	

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

404421338	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404421698	ANALYTICAL RESULTS
404421700	ANALYTICAL RESULTS
404421702	ANALYTICAL RESULTS
404425302	SITE INVESTIGATION PLAN
404430325	SITE INVESTIGATION REPORT
404587890	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)