

State of Colorado
Energy & Carbon Management Commission

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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 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 Phone: (970) 304-5000 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 #: 41763 Initial Form 27 Document #: 404257001

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: LOCATION | Facility ID: 427447 | API #: _____ | County Name: WELD |
| Facility Name: STROH PC H 12-31D TANK | Latitude: 40.245430 | Longitude: -104.620050 | |
| | ** correct Lat/Long if needed: Latitude: 40.245479 | Longitude: -104.620203 | |
| QtrQtr: NWNW | Sec: 12 | Twp: 3N | Range: 65W 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

Riverine 0.03mi W

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.

On 09/03/2025 through 09/05/2025, a site investigation was conducted pursuant to ECMC Rule 911 at the STROH PC H 12-31D Facility and Tank Battery location. Grab confirmation soil samples were collected from the produced water vessel excavation base (PWV01-B@5', PWV02-B@5', PWV03-B@5', and PWV04-B@5') and sidewalls (PWV01-N@4', PWV02-N@4', PWV03-N@4', and PWV04-E@4'), beneath the above ground oil tanks (AST01@0-6", AST02@0-6", AST03@0-6", AST04@0-6", AST05@0-6", and AST06@0-6"), at the risers for the flowline (SEP03-FL@3') and dumplines (SEP01-DL@3', SEP02-DL@3', SEP03-DL@3', and SEP04-DL@3') of the separators. 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. Soil samples were not collected beneath flowline risers of the two westernmost separators (SEP01-FL and SEP02-FL) or easternmost separator (SEP04- FL) during initial decommissioning activities, as proposed in the sample location map attached to the IF27 (ECMC Document #404257001).

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):

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, metals in soil per ECMC Table 915-1, pH, EC, SAR, 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 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. 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. A detailed summary of tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was submitted under Form 27 Document #404439205.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 11
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) 8.28
-- Highest concentration of SAR 2.37
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?

Between 09/05/2025 and 01/09/2026, 19 background samples were collected from five discrete locations (BKG01-BKG05) 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 0.5 and 5 feet below ground surface (ft bgs). The maximum and minimum concentrations for pH were observed to be 6.43 and 7.53, respectively. The maximum background concentration with a 1.25x multiplier applied for arsenic was calculated to be 3.1 mg/kg. One soil sample (SEP03-DL@3') collected during decommissioning exhibits elevated arsenic and selenium above ECMC Table 915-1 standards and local 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.

The elevated metals above ECMC Table 915-1 residential soil screening levels (RSSLs) and local background levels observed at sample location SEP03-DL@3' will be removed through a remedial excavation. During the remedial excavation, confirmation soil samples will be collected and submitted for analysis of full ECMC Table 915-1 parameters. The results of the remedial excavation will be submitted on a subsequent Form 27.

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) was conducted on 01/09/2026 to delineate impacted media, during which eight soil borings were advanced to depths ranging from 0.5 to 5 ft. bgs. BH01 and BH02 were advanced at the same locations as soil samples AST04@0-6" and AST01@0-6", respectively, to vertically delineate elevated pH at those locations. BH03-BH05 were advanced surrounding BH01 and BH02 to vertically and laterally delineate elevated pH identified at AST01@0-6" and AST04@0-6". Soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Groundwater was not encountered during this investigation. Soil boring samples SEP01-FL@3-4', SEP02-FL@3-4', and SEP04-FL@3-4' were advanced to collect confirmation soil samples beneath the flowline risers of the former separators, which sampled during initial decommissioning activities in September 2025.

Based on the soil analytical results of the September 2025 Decommissioning and January 2026 SSI activities, the elevated pH values observed at AST01@0-6" and AST04@0-6" are fully delineated. A detailed reclamation plan will be generated prior to requesting no further action (NFA) for this location.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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 SSI 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 SSI Sample Summary, Supplemental Source Mass Removal (SSMR) 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 MWZZ 316714 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 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. 07/09/2026

Proposed date of completion of Reclamation. 07/09/2027

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. 02/16/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/03/2025

Proposed site investigation commencement. 01/09/2026

Proposed completion of site investigation. 01/09/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/09/2026

Proposed date of completion of Remediation. 10/09/2026

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 the January 2026 supplemental site investigation (SSI) at the Stroh PC H 12-31 tank battery and necessity for the generation of a detailed reclamation plan. Additionally, a remedial excavation will be completed to remove the soil with elevated metals above ECMC Table 915-1 residential soil screening levels (RSSLs) and local background levels observed at sample location SEP03-DL@3'. The results of the remedial excavation and detailed reclamation plan will be submitted on a subsequent Form 27, prior to an NFA request.

OPERATOR COMMENT

This Form 27 is being submitted to include the supplemental site investigation (SSI) results and propose source removal activities for the Stroh PC H 12-31D Tank Battery (Rem # 41763) location. A proposal to excavate the pH exceedances identified during decommissioning (AST01@0-6" and AST04@0-6") is presented in the Remedial Action Plan section of this Form 27. A comprehensive data packet summarizing the SSI activities is attached to this Form 27, and a detailed summary of the previously completed SSI activities is presented in the Remedial Action Plan sections and below.

A supplemental site investigation (SSI) was conducted on 01/09/2026 to delineate impacted media, during which eight soil borings were advanced to depths ranging from 0.5 to 5 ft. bgs. BH01 and BH02 were advanced at the same locations as soil samples AST04@0-6" and AST01@0-6", respectively, to vertically delineate elevated pH at those locations. BH03-BH05 were advanced surrounding BH01 and BH02 to vertically and laterally delineate elevated pH identified at AST01@0-6" and AST04@0-6". Soil samples were collected and analyzed for full ECMC Table 915-1 constituents. Groundwater was not encountered during this investigation. Soil boring samples SEP01-FL@3-4', SEP02-FL@3-4', and SEP04-FL@3-4' were advanced to collect confirmation soil samples beneath the flowline risers of the former separators, which sampled during initial decommissioning activities in September 2025.

Based on the soil analytical results of the September 2025 Decommissioning and January 2026 SSI activities, the elevated pH values observed at AST01@0-6" and AST04@0-6" are fully delineated. A detailed reclamation plan will be generated prior to requesting no further action (NFA) for this location.

Between 09/05/2025 and 01/09/2026, 19 background samples were collected from five discrete locations (BKG01-BKG05) 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 0.5 and 5 feet below ground surface (ft bgs). The maximum and minimum concentrations for pH were observed to be 6.43 and 7.53, respectively. The maximum background concentration with a 1.25x multiplier applied for arsenic was calculated to be 3.1 mg/kg. One soil sample (SEP03-DL@3') collected during decommissioning exhibits elevated arsenic and selenium above ECMC Table 915-1 standards and local background levels.

The elevated metals above ECMC Table 915-1 residential soil screening levels (RSSLs) and local background levels observed at sample location SEP03-DL@3' will be removed through a remedial excavation. During the remedial excavation, confirmation soil samples will be collected and submitted for analysis of full ECMC Table 915-1 parameters. The results of the remedial excavation will be submitted on a subsequent Form 27.

Pursuant to Rule 913.e, quarterly reporting will be conducted until closure criteria are achieved for the remediation project.

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

Signed: Allan Engelhardt

Title: Environmental Consultant

Submit Date: 03/05/2026

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: Grace Rollins

Date: 03/23/2026

Remediation Project Number: 41763

COA Type

Description

| COA Type | Description |
|----------|-------------|
| 0 COA | |

ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

| Att Doc Num | Name |
|-------------|--------------------------------|
| 404545903 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 404546729 | LABORATORY ANALYTICAL REPORT |
| 404562605 | SITE INVESTIGATION REPORT |

Total Attach: 3 Files

General Comments

| User Group | Comment | Comment Date |
|------------|---------|---------------------|
| | | Stamp Upon Approval |

Total: 0 comment(s)