

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



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Receive Date:  
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Report taken by:  
Kilian Collins

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27801 Initial Form 27 Document #: 403326800

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: LOCATION                            | Facility ID: 329937 | API #: _____           | County Name: WELD                          |
| Facility Name: PROSPECT CO-64N64W 26NENE           | Latitude: 40.288870 | Longitude: -104.510820 |  |
| ** correct Lat/Long if needed: Latitude: 40.286501 |                     | Longitude: -104.512236 |  |
| QtrQtr: NENE                                       | Sec: 26             | Twp: 4N                | Range: 64W Meridian: 6 Sensitive Area? Yes |
| Facility Type: SPILL OR RELEASE                    | Facility ID: 484887 | API #: _____           | County Name: WELD                          |
| Facility Name: Prospect CO-64N64W 26NESW           | Latitude: 40.286530 | Longitude: -104.512106 |  |
| ** correct Lat/Long if needed: Latitude: _____     |                     | Longitude: _____       |  |
| QtrQtr: NESW                                       | Sec: 26             | Twp: 4N                | Range: 64W Meridian: 6 Sensitive Area? Yes |

## SITE CONDITIONS

General soil type - USCS Classifications SW \_\_\_\_\_

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**

Perennial Lake/Pond 112ft NW  
Palustrine wetland 106ft NW, 0.20mi S  
Riverine 636ft WSW  
No other potential receptors are located within ¼ mile of the Site.  
Above distances are approximations.

**DENIED**

# 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 or 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 PROSPECT T4N-R64W-S26 L02 Facility and Tank Battery location. The Field Qualitative Criteria Checklist was utilized during facility decommissioning activities and no visual and olfactory impacts were observed. Based on laboratory analytical data, a historical release was discovered on August 8, 2023, under F19 Document Number 403489207, for elevated 1,3,5-TMB, TPHs (GRO, DRO, ORO) and Benzo(a)anthracene at sample location PWVB01@6'.

## 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), and at the risers for the flowline(s) and dumpline(s) of any separator(s). Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

### Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters 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 of the tank battery area occurred during abandonment activities. Field personnel field screened all disturbed areas using a PID, visual, and olfactory senses to determine if laboratory confirmation sampling was required. The ECMC Tank Battery and Produced Water Vessel Closure Checklists were utilized and filled out during the abandonment process. A photolog was attached.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 8

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

Number of soil samples exceeding 915-1 6 -- Highest concentration of SAR 2.13

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

Approximate areal extent (square feet) 600 Vertical Extent > 915-1 (in feet) 13

**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?

Five background soil samples were collected on 7/27/2023 from an area not impacted by oil and gas development and at depths and lithologies (Poorly Graded Sand – SP) comparable to those of the confirmation soil samples collected at the location. The samples were analyzed by a certified laboratory for Table 915-1 metals and SSR parameters using ECMC approved Methods. Background soil sample analytical results were reported with elevated levels of pH and Arsenic (As).

Background Soil Sample Analysis (mg/kg)  
pH: Max = 8.69  
As: Max\*1.25 = 1.53

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?

Refer to Remedial Action Plan Section.

**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 organic compound exceedances observed at sample location PWVB01@6' were removed through a remedial excavation. Remedial excavation confirmation soil samples were collected and analyzed for full ECMC Table 915-1 constituents. The impacted soil was disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

**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.

Laboratory analytical results indicated a historical release had occurred at the location of soil sample PWVB01@6' and was reported as a historic release in

Form 19 document number 403489207. A comprehensive site investigation was completed 10/1/2024 to delineate impacts at sample location PWVB01@6'. Six soil samples were collected to define the magnitude and extent of soil impacts at the location.

On 10/2/2025, Petroleum-impacted soil was fully removed from the Prospect CO-64N64W 26NESW release area by excavation. This was confirmed by the analyses of soil samples collected from the excavation which were below the ECMC Table 915-1 PGSSLs for organic petroleum constituents.

Metals were not fully removed within the excavation (arsenic, chromium). Six samples collected within the excavation exceeded the ECMC Table 915-1 Residential Soil Screening (RSSLs) for arsenic when compared to the 125% maximum background concentration. One sample collected within the excavation exceeded the ECMC Table 915-1 RSSLs for chromium when compared to the 125% maximum background concentration.

The Operator proposes to collect additional background samples from five locations in native soil, adjacent to the former facility from similar depths and lithologies and submit the samples for Table 915-1 metals and SSR constituents in an effort to attribute elevated concentrations (arsenic and hexavalent chromium) present within the excavation to native soil conditions. Alternatively, if the sample results exceed the Table 915-1 standards and cannot be attributed to native soil conditions via background soil characterization Noble will evaluate remedial alternatives to address in situ elevated metals not attributable to background concentrations and greater than the applicable Table 915-1 concentration standards.

Groundwater was not encountered during excavation activities.

### Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 385

\_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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 site investigation or excavation activities. If groundwater is encountered at the site, groundwater sampling will be conducted in accordance with the Proposed Groundwater Sampling section in this Form 27.

# 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 (policy 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 385

E&P waste (solid) description E&P solid waste derived from excavation activities

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: North Weld Landfill, Ault, CO

Volume of E&P Waste (liquid) in barrels 0

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 ECMC1000 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. 10/31/2025

Proposed date of completion of Reclamation. 06/30/2027

## 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. 01/25/2023

Actual Spill or Release date, or date of discovery. 08/08/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/27/2023

Proposed site investigation commencement. 03/02/2023

Proposed completion of site investigation. 06/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/01/2024

Proposed date of completion of Remediation. 10/02/2025

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

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

Basis for change in implementation schedule:

The 'Proposed date of completion of Remediation' section has been updated to reflect the actual date on which remedial excavation activities was completed. The 'Proposed completion of site investigation' section of the implementation schedule has been changed due to the need for additional native soil characterization adjacent to the former PROSPECT CO-64N64W 26NENE Tank Battery.

**OPERATOR COMMENT**

This Form 27 is being submitted to include a 1Q 2026 timeline update for the Prospect CO-64N64W 26NENE tank battery (REM # 27801). The Operator will complete the additional site investigation as outlined in this proposed Site Investigation Report workplan prior to the Proposed completion of site investigation date detailed in the Implementation schedule. A qualified drilling crew is not immediately available but is expected to commence the work in Q2 2026. Pursuant to Rule 913.e, quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation will be submitted on 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: Jordan Suttles

Title: Environmental Consultant

Submit Date: 03/18/2026

Email: jordans@fremontenv.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: 27801

**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**

|           |                                |
|-----------|--------------------------------|
| 404581028 | FORM 27-SUPPLEMENTAL-SUBMITTED |
|-----------|--------------------------------|

Total Attach: 1 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

|               |   |            |
|---------------|---|------------|
| 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> | 03/23/2026 |
|---------------|---|------------|

Total: 1 comment(s)