



ERM

1200 17th Street
Floor 10
Denver, CO, 80202

T +1 303 741-5050
erm.com

17 March 2026

Dillard USX AB 29-17

Remediation #32095

Operator NOBLE #100322

This Supplemental Site Investigation Report has been prepared by Environmental Resources Management, Inc. (ERM), on behalf of Noble Energy, Inc. (Noble), for Dillard USX AB 29-17, Remediation #32095 (**Figure 1**).

BACKGROUND

Pursuant to Colorado Energy and Carbon Management Commission (ECMC) Rule 911, a site investigation was conducted pertaining to the Dillard USX AB 29-17 wellhead decommissioning. The wellhead was cut and capped per ECMC rules.

Confirmatory sampling conducted on 13 February 2024 as part of initial wellhead closure activities revealed exceedances of ECMC Table 915-1 regulatory standards for soil quality. Closure activities are documented in the Site Investigation Report (Supplemental Form 27), submitted to the ECMC on 28 March 2024, Document #403976118.

Analytical results from wellhead soil sample WH-FS-01@7' reported exceedances of the ECMC Table 915-1 Groundwater Soil Screening Level (GSSL) and the site-specific background cleanup level for barium, with an analytical result of 113 milligrams per kilogram (mg/kg).

As part of Noble's Voluntary Disclosure under ECMC Rule 525.e. (Disclosure), ERM conducted a comprehensive review and assessment of prior environmental consulting work (Data Integrity Review [DIR]). Site Data Integrity Review and Remedial Action Plan (RAP) was submitted as an attachment to the Supplemental Form 27 (Document #404446521) to the ECMC on 22 December 2025. Based on the planned and recommended activities identified in the DIR, this supplemental site investigation was conducted as part of a RAP to advance the project toward closure and No Further Action (NFA) status.

SITE INVESTIGATION ACTIVITIES

SOIL SAMPLING

On 22 January 2026, ERM conducted shallow delineation and background soil sampling using a hand auger around the former wellhead to delineate for the previous barium exceedance.

ERM advanced five soil borings (BG-02 through BG-06) to serve as nearby, non-impacted, sampling locations to evaluate background concentrations for the respective target analytes, as shown in **Figure 2**. All locations were sampled at 7 feet below ground surface (bgs).

A total of six soil samples, comprising five background samples and one duplicate sample (collected from the same sample location and depth as sample BG-02-SO-7), were submitted to Pace Analytical Services, LLC (Pace), an accredited facility located in Mount Juliet, Tennessee for barium analysis.

RESULTS

Analytical results from the January 2026 supplemental site investigation, along with historical data, are detailed in **Table 1** through **Table 5**. The complete encrypted analytical report from Pace is included as an attachment with the respective Form 27 submittal of this report.

BACKGROUND SAMPLES

As shown in **Figure 3**, the following background samples exceed ECMC Table 915-1 for:

- Barium GSSL standard of 82 mg/kg at samples BG-06-SO-7 and DUP-01-SO (collected at the same location and depth as sample BG-02-SO-7), with results ranging between 140 to 814 mg/kg.

NEXT STEPS

The supplemental site investigation was conducted to address the previously identified barium exceedance in the wellhead soil sample. As part of this effort, background soil borings were advanced to establish a representative site-specific cleanup level for barium. Laboratory analytical results demonstrate that the barium concentration in the wellhead soil is consistent with the local background level established during this supplemental site investigation. No evidence of impacts requiring further delineation or remedial measures was identified. The investigation results satisfy the required data needs associated with the prior Table 915-1 exceedance and indicate that no additional investigation and remediation is warranted. Based on the data collected and the absence of remaining environmental concerns, NFA request is being submitted to the ECMC in the accompanying Supplemental Form 27, which includes this Supplemental Site Investigation Report and the encrypted laboratory report as a standalone document.