

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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404591679
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03/25/2026

Report taken by:
Rick Allison

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
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 #: 35740 Initial Form 27 Document #: 403749434

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: 310218	API #: _____	County Name: WELD
Facility Name: Hookem USX AB 09-16P	Latitude: 40.582241	Longitude: -104.547530	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 9	Twp: 7N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 487582	API #: _____	County Name: WELD
Facility Name: Dillard USX AB 09-16	Latitude: 40.580767	Longitude: -104.547391	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 9	Twp: 7N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 488481 API #: County Name: WELD
Facility Name: Dillard USX AB 09-15P Latitude: 40.580692 Longitude: -104.547393
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWSE Sec: 9 Twp: 7N 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? No
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Well Within Pronghorn Winter Concentration Area HPH
No other potential receptors are located within 1/4 mile of the Site.



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 DILLARD USX T7N-R64W-S9 L01 Facility and Tank Battery location.

As approved under Supplemental Form 27 (Document No. 404132242), consolidation of the impacts identified at the former Dillard USX AB 09-16 flowline (REM #35686) under Remediation No. 35740 was approved. The Field Qualitative Criteria Checklist was utilized during flowline decommissioning activities, and no visual or olfactory impacts were observed. However, based on laboratory analytical data, a historical release was identified on August 8, 2024 (F19 Document No. 403881628), due to elevated Benzo(a)Anthracene concentrations at sample location SEP01-FL, 2 feet.

Additionally, as approved under Supplemental Form 27 (Document No. 404132242), consolidation of the impacts identified along the former Dillard USX AB 09-15P flowline (REM #35684) under Remediation No. 35740 was also approved. The Field Qualitative Criteria Checklist was again utilized during flowline decommissioning activities, with no visual or olfactory impacts observed. Laboratory analytical results identified a historical release on November 2, 2024 (F19 Document No. 403980091), due to elevated Benzo(a)Anthracene concentrations at sample location FL01-10, 2 feet.

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 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 along the flowline and at the wellhead and separator areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The applicable ECMC Closure Checklists were utilized and filled out during the abandonment process. A photolog was attached on document number 403991794.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 20
Number of soil samples exceeding 915-1 13
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 1300

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 1.84
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

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?

Ten background soil samples were collected on 7/18/2024 from an area not impacted by oil and gas development and at depths and lithologies (well graded sand – SW) 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 arsenic (As), Barium (Ba), Cadmium (Cd), Hexavalent Chromium (Cr VI), Lead (Pb) and Selenium (Se).

Background Soil Sample Analysis (mg/kg)
As: Max*1.25 = 11.2
Ba: Max*1.25 = 135
Cd: Max*1.25 = 0.715
Cr VI: Max*1.25 = 0.375
Pb: Max*1.25 = 17.9
Se: Max*1.25 = 0.610

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 the Remedial Action Plan section of this form.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The organic compound exceedances observed at sample locations SEP01-FL 2FT and FL01-10 2FT 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 nonhazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

The pH inorganic compound exceedances observed at sample locations AST01 0.5 Ft, AST02 0.5 ft, PWV01 B 2 Ft 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 nonhazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

REMEDIATION 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.

The sources were excavated from the DILLARD USX T7N-R64W-S9 L01 AST01 0.5 Ft, AST02 0.5 ft, PWV01 B 2 Ft, Dillard USX AB 09-16 flowline SEP01-FL 2FT and Dillard USX AB 09-15 FL01-10 release areas between February 2, 2025 and February 6, 2025. Confirmation soil samples were collected and analyzed for the full Table 915-1 suite of analytes.

The laboratory analyses indicate that petroleum constituents in soil samples collected from the excavation achieved the ECMC Table 915-1 Protection of Groundwater Standards (PGSSLs) for organic petroleum constituents. However, five samples collected within the FL01-10 2 Ft/SEP01-FL 2FT excavation and seven samples collected from the AST excavation exceeded the ECMC Table 915-1 Soil Suitability for Reclamation (SSR) standards for pH when compared to the maximum background concentration. One sample collected within the separator excavation and one sample collected from the AST excavation exceeded the ECMC Table 915-1 PGGSLs for barium when compared to the 125% maximum background concentration for barium.

A supplemental site investigation (SSI) will be completed to collect additional background samples to determine if elevated levels of inorganics and metals (specifically pH and barium) are attributed to native soil conditions at the site. The proposed background sample locations are included in the Site Map attached to Form 27 Document Number 404478564. Background soil samples will be analyzed by a certified laboratory for analysis of metals per ECMC Table 915-1 and soil suitability for reclamation parameters including pH, EC, SAR, and boron. The results of the SSI will be submitted on a subsequent Form 27.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)	Yes	Excavate and offsite disposal
_____ Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) _____ 89
_____ 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 (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? 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 89

E&P waste (solid) description Hydrocarbon Impacted Soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill in Keenesburg, Colorado

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 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. 03/31/2025

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. 04/04/2024

Actual Spill or Release date, or date of discovery. 08/07/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/18/2024

Proposed site investigation commencement. 06/09/2024

Proposed completion of site investigation. 06/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/07/2024

Proposed date of completion of Remediation. 02/06/2025

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 were completed. The 'Proposed completion of site investigation' section has been updated to reflect the need for supplemental background site investigation activities adjacent to the DILLARD USX T7N-R64W-S9 L01 AST01 0.5 Ft, AST02 0.5 ft, Dillard USX AB 09-16 flowline SEP01-FL 2FT and Dillard USX AB 09-15 FL01-10 release areas.

OPERATOR COMMENT

This Form 27 is being submitted to include a 1Q 2026 timeline update for the DILLARD USX T7N-R64W-S9 L01 timeline update (REM # 35740). The review status of the previously proposed workplan (Doc. # 404478564) is "In Process" on Web Forms. Supplemental form 27 document number 404478564 includes completed remedial excavation results. 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: 03/25/2026

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: 35740

COA Type

Description

0 COA	
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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

404591679	FORM 27-SUPPLEMENTAL-SUBMITTED
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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>	04/01/2026
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Total: 1 comment(s)