

State of Colorado
Energy & Carbon Management Commission

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404590251
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Report taken by:
Abdul Elnajdi

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 #: 28078 Initial Form 27 Document #: 403340247

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: 447346	API #: _____	County Name: WELD
Facility Name: TREBOR B12-05,19	Latitude: 40.416848	Longitude: -104.505903	
** correct Lat/Long if needed: Latitude: 40.416586		Longitude: -104.505977	
QtrQtr: SWNW	Sec: 12	Twp: 5N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 484407	API #: _____	County Name: WELD
Facility Name: Trebor B12-05, 19	Latitude: 40.416813	Longitude: -104.505994	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 12	Twp: 5N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Cropland _____

Is domestic water well within 1/4 mile? Yes _____

Is surface water within 1/4 mile? Yes _____

Is groundwater less than 20 feet below ground surface? Yes _____

Other Potential Receptors within 1/4 mile

Emergent Wetlands 70ft ENE, 0.16mi NW, Riverine Wetlands 0.11mi E (Crow Creek), 0.05mi SW (North Fork Ogilvy Ditch)

Farm Structures 0.08 W, 0.08 WSW, 0.09/0.09/0.25 SW

Residential 0.10 WSW, 0.24 SW

No other potential receptors are located within ¼ mile of the Site.

Above distances are approximations.

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
No	GROUNDWATER	Refer to Tables and Figures	Lab Analysis and Field Screening
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 April 26, 2023, a historical release was identified beneath the former produced water vault (PWV) during decommissioning activities as reported to the ECMC via Form 27 #403592415. Soil samples were submitted to a certified laboratory for analysis of ECMC Table 915-1 volatile organic compounds (VOC), polycyclic aromatic hydrocarbons (PAH), and soil suitability for reclamation (SSR). ECMC Table 915-1 metals in soil were not analyzed. Laboratory analytical results indicated soil sample PWV_Floor_6FT exceeded ECMC Table 915-1 PGSSLs for total petroleum hydrocarbons (TPH), 1-methylnaphthalene, and 2-methylnaphthalene. SSR parameters were below ECMC Table 915-1 regulatory limits.

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):

Naphthalene, TPH, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, and selenium exceedances of ECMC Table 915-1 PGSSL remain in-situ within the saturated zone at 11-12 feet bgs following September 2024 excavation activities. Groundwater in monitoring well MW-1 was measured to be 9.91 feet bgs in February 2024 and observed at 10.5 feet bgs during excavation. Monitoring well MW-1 was destroyed during excavation.

3/18/26, Noble obtained landowner access (LO_Access_Call-Log attached) and proposes the reinstallation of monitoring well MW-1, two additional monitoring wells within the former excavation extent, and one background well to establish native inorganic levels. At least one soil sample will be collected from each new monitoring well location and submitted to a certified laboratory for analysis of ECMC Table 915-1 VOC, PAH, SSR, and metals per ECMC-approved Methods. Proposed monitoring well locations are presented on Figures 2-3 of the attached Site Investigation Plan.

Proposed Groundwater Sampling

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

3/18/26, Noble obtained landowner access (LO_Access_Call-Log attached) & proposes the reinstallation of monitoring well MW-1 & two additional monitoring wells within the former excavation extent to evaluate the soil leaching to groundwater pathway for soil exceeding ECMC Table 915-1 PGSSL that remain in-situ within the saturated zone and one background well to establish native inorganic levels. Groundwater samples will be collected quarterly and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, chloride and sulfate ion, TDS, and dissolved selenium per ECMC-approved Methods until remediation criteria have been achieved and following the observation of four consecutive quarters of groundwater compliant with applicable ECMC Table 915-1 regulatory limits under static conditions. Proposed monitoring well locations are presented on Figures 2-3 of the attached Site Investigation Plan.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 41
Number of soil samples exceeding 915-1 41
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 2800

NA / ND

-- Highest concentration of TPH (mg/kg) 16800
-- Highest concentration of SAR 4.23
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 12

Groundwater

Number of groundwater samples collected 6
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 11
Number of groundwater monitoring wells installed 1
Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____
ND Highest concentration of Toluene (µg/l) _____
-- Highest concentration of Ethylbenzene (µg/l) 32
ND Highest concentration of Xylene (µg/l) _____
NA 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?

On February 13, 2024, ten background samples were collected from an area not previously disturbed by oil and gas development with similar depth and lithologies as soil samples collected as part of the site investigation/excavation and analyzed for ECMC Table 915-1 metals and soil suitability for reclamation standards (pH, EC, SAR, and boron). Background analytical results indicated elevated levels of pH, arsenic, and lead. Site-specific cleanup levels were calculated for pH (9.35), arsenic (12.1 mg/kg), and lead (14.6 mg/kg).

All background soil samples were below the laboratory detection limit for selenium and therefore no site-specific cleanup level was established. Selenium in soil samples SB-3 (12.0'), SB-4 (11.0'), SB-5 (10.0'), MW-1 (11.0'), SB-8 (11.0'), SB-9 (11.0'), SB-10 (12.0'), SB-11 (12.0') and B01@11.0' exceeded the ECMC PGSSL. All other SSR and metals were below applicable ECMC Table 915-1 regulatory limits and/or below site-specific cleanup 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?

On March 19, 2026, Noble obtained landowner access (LO_Access_Call-Log attached) & proposes the reinstallation of monitoring well MW-1 & two additional monitoring wells within the former excavation extent to evaluate the soil leaching to groundwater pathway for soil exceeding ECMC Table 915-1 PGSSL that remain in-situ within the saturated zone and one background well to establish native inorganic levels. Groundwater samples will be collected quarterly and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, chloride and sulfate ion, TDS, and dissolved selenium per ECMC-approved Methods until remediation selenia have been achieved and following the observation of four consecutive quarters of groundwater compliant with applicable ECMC Table 915-1 regulatory limits under static conditions. Proposed monitoring well locations are presented on Figures 2-3 of the attached Site Investigation Plan.

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.

From September 19-27, 2024, a total of 1,030 cubic yards of petroleum hydrocarbon-impacted soil were excavated and removed from beneath the former produced water vault as reported via Form 27 #404014410. Impacted soil was transported offsite for disposal at Buffalo Ridge Landfill in Keenesburg, Colorado, as non-hazardous waste per Rules 905 and 906. The excavation extent measured 70 feet (north-south) by 40 feet (east-west) to a depth of 11 feet bgs. Generally, sandy clay was observed to a depth of approximately 3 feet below ground surface (bgs) underlain by a well-graded sand (increasing coarseness with depth). Groundwater was encountered within the excavation at 10.5 feet bgs. Grab soil samples were collected from the sidewalls of the final excavation extent at a depth of 10 feet bgs and from the floor of the excavation at 11 feet bgs (saturated zone). Five grab groundwater samples were collected from the floor of the excavation. Copies of the waste manifests are available upon request. The excavation extent is presented on Figure 2 of the attached Site Investigation Plan.

Laboratory analytical results indicate all grab groundwater samples were below ECMC Table 915-1 regulatory limits for organic petroleum hydrocarbon constituents. Organic petroleum constituents in soil samples collected from sidewalls of the final excavation extent were below ECMC Table 915-1 PGSSLs and RSSLs. However, all floor samples (B01@11, B02@11, B03@11, B04@11, B05@11) exceeded the PGSSL for TPH and floor samples B01@11 and B02@11 exceeded the PGSSL for benzo(a)anthracene. Elevated levels of pH, arsenic, and selenium were identified; however, only selenium exceeded applicable ECMC Table 915-1 regulatory limits and calculated background concentrations. Petroleum hydrocarbon-impacted soil was removed from the vadose via excavation; however, ECMC PGSSL exceedances of TPH, benzo(a)anthracene, 1-methylnaphthalene, and 2-methylnaphthalene remain in-situ within the saturated zone.

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.

2/13/24, 23 soil samples were collected from 11 soil borings as part of a comprehensive site investigation to vertically/horizontally delineate impacted soil as reported to the ECMC via Form 27 #403820059. Laboratory analytical results identified VOC and PAH exceedances of ECMC Table 915-1 PGSSL in 13 of the 23 soil samples collected. Additionally, soil sample MW-1@8 exceeded the ECMC Table 915-1 RSSLs for ethylbenzene, naphthalene, and 1-methylnaphthalene. Elevated levels of pH, arsenic, cadmium, and selenium were identified. Groundwater monitoring well MW-1 was installed within the source area. The groundwater sample collected from MW-1 indicated dissolved-phase organic constituents were below applicable ECMC Table 915-1 regulatory limits.

Following the 2024 excavation, which successfully removed petroleum hydrocarbon-impacted soil from the vadose, ECMC PGSSL exceedances of TPH, benzo(a)anthracene, 1-methylnaphthalene, and 2-methylnaphthalene remain in-situ within the saturated zone.

3/19/26, Noble obtained landowner access (LO_Access_Call-Log attached) & proposes the reinstallation of monitoring well MW-1 & two additional monitoring wells within the former excavation extent to evaluate the soil leaching to groundwater pathway for soil exceeding ECMC Table 915-1 PGSSL that remain in-situ within the saturated zone and one background well to establish native inorganic levels. Groundwater samples will be collected quarterly and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, chloride and sulfate ion, TDS, and dissolved selenium per ECMC-approved Methods until remediation criteria have been achieved and following the observation of four consecutive quarters of groundwater compliant with applicable ECMC Table 915-1 regulatory limits under static conditions. Proposed monitoring well locations are presented on Figures 2-3 of the attached Site Investigation Plan.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 1030

_____ 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

No _____ Bioremediation (or enhanced bioremediation)

No _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

No _____ Natural Attenuation

No _____ 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.

On February 13, 2024, groundwater monitoring well MW-1 was installed, sampled, and submitted to a certified laboratory for analysis of ECMC Table 915-1 organics which indicated compliance with applicable regulatory limits. Five grab groundwater samples were collected from groundwater encountered within the September 2024 excavation and submitted to a certified laboratory for analysis of ECMC Table 915-1 organics and inorganics which indicated compliance with applicable regulatory limits.

On March 19, 2026, Noble obtained landowner access (LO_Access_Call-Log attached) and proposes the reinstallation of monitoring well MW-1 and two additional monitoring wells within the former excavation extent to evaluate the soil leaching to groundwater pathway for soil exceeding ECMC Table 915-1 PGSSL that remain in-situ within the saturated zone and one background well to establish native inorganic levels. Groundwater samples will be collected quarterly and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, chloride and sulfate ion, TDS, and dissolved selenium per ECMC-approved Methods until remediation criteria have been achieved and following the observation of four consecutive quarters of groundwater compliant with applicable ECMC Table 915-1 regulatory limits under static conditions. Proposed monitoring well locations are presented on Figures 2-3 of the attached Site Investigation Plan.

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 Supplemental Site Investigation 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 1030

E&P waste (solid) description Hydrocarbon Impacted Soils

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill, Keenesburg, 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? No _____

Is additional groundwater monitoring to be conducted? Yes _____

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. 04/26/2023

Proposed date of completion of Reclamation. 10/31/2027

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. 03/02/2023

Actual Spill or Release date, or date of discovery. 05/04/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/26/2023

Proposed site investigation commencement. 03/06/2025

Proposed completion of site investigation. 09/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/30/2026

Proposed date of completion of Remediation. 12/31/2027

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 operator is requesting additional time to commence supplemental site investigation activities. Supplemental site investigation activities will commence on or before the date specified in the "Proposed completion of site investigation" section.

OPERATOR COMMENT

This Form 27 is being submitted to inform the ECMC that landowner access has been granted and to propose supplemental site investigation (SSI) for the Trebor B12-05, 19 (REM #28078).

Site-specific cleanup levels were calculated for pH (9.35), arsenic (12.1 mg/kg), and lead (14.6 mg/kg). All background soil samples were below the laboratory detection limit for selenium and therefore no site-specific cleanup level was established. Selenium in soil samples SB-3 (12.0'), SB-4 (11.0'), SB-5 (10.0'), MW-1 (11.0'), SB-8 (11.0'), SB-9 (11.0'), SB-10 (12.0'), SB-11 (12.0') and B01@11.0' exceeded the ECMC PGSSL. All other SSR and metals were below applicable ECMC Table 915-1 regulatory limits and/or below site-specific cleanup levels.

September 2024, a total of 1,030 cubic yards of petroleum hydrocarbon-impacted soil were excavated and removed from beneath the former produced water vault. The excavation extent measured 70 feet (north-south) by 40 feet (east-west) to a depth of 11 feet bgs. Groundwater was encountered within the excavation at 10.5 feet bgs. Laboratory analytical results indicated petroleum hydrocarbon-impacted soil was successfully removed from the vadose zone. However, TPH, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, and selenium ECMC PGSSL exceedances of remain in-situ within the saturated zone.

On February 13, 2024, groundwater monitoring well MW-1 was installed, sampled, and submitted to a certified laboratory for analysis of ECMC Table 915-1 organics which indicated compliance with applicable regulatory limits. Five grab groundwater samples were collected from groundwater encountered within the September 2024 excavation and submitted to a certified laboratory for analysis of ECMC Table 915-1 organics and inorganics which indicated compliance with applicable regulatory limits.

On March 19, 2026, Noble obtained landowner access (LO_Access_Call-Log attached) and proposes the reinstallation of monitoring well MW-1 and two additional monitoring wells within the former excavation extent to evaluate the soil leaching to groundwater pathway for soil exceeding ECMC Table 915-1 PGSSL that remain in-situ within the saturated zone and one background well to establish native inorganic levels. Groundwater samples will be collected quarterly and submitted to a certified laboratory for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, benzo(a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, chloride and sulfate ion, TDS, and dissolved selenium per ECMC-approved Methods until remediation criteria have been achieved and following the observation of four consecutive quarters of groundwater compliant with applicable ECMC Table 915-1 regulatory limits under static conditions. Proposed monitoring well locations are presented on Figures 2-3 of the attached Site Investigation Plan.

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: Andrew Davis

Title: Environmental Consultant

Submit Date: 04/16/2026

Email: CVX-PM@cdhconsult.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: Abdul Elnajdi

Date: 04/16/2026

Remediation Project Number: 28078

COA Type

Description

COA Type	Description
1 COA	Operator shall continue quarterly reporting until the site investigation is complete, including vertical and lateral delineation of all impacts, and Table 915-1 standards are met within the remediation area.

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

Att Doc Num	Name
404590251	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
404594602	CORRESPONDENCE
404607122	SITE INVESTIGATION PLAN
404623477	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

Date Run: 4/16/2026 Doc [#404590251]

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC appreciates the clear and detailed explanation provided in this submittal and encourages continued use of this level of documentation in future submissions.	04/16/2026

Total: 1 comment(s)