

Final Closure Request

Parcel T031

ECMC Facility ID Number 490068
ECMC Remediation Project Number 40909
Weld County, CO

TO:
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Prepared by:
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DATE
April 21, 2026

PROJECT
Bishop Well Loss of Containment

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Prepared For:
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Introduction and Purpose

This Final Closure Request (Final Closure) was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Noble Energy Inc. (Noble) in response to the Bishop Well Loss of Containment at an oil and gas facility south of Weld County Road 74 (Bishop Well Incident) in Galeton, Colorado. The incident occurred at approximately 6:00 p.m. on Sunday, April 6, 2025.

This memorandum summarizes the environmental investigation and findings for Parcel T031, conducted in accordance with Colorado Energy and Carbon Management Commission (ECMC) 900 Series Rules and associated ECMC operator guidance documents. The purpose of this investigation was to determine whether any further action was warranted and included an initial parcel assessment, Rapid Assessment Technique (RAT) survey, visual observations, and laboratory analysis of soil samples collected at the property. Analytical results were evaluated against ECMC and Environmental Protection Agency (EPA) residential soil screening levels (RSSLs) and were compared with background samples obtained within the vicinity of the site, as outlined in the *Derivation of Site-Specific Soil Inorganic Background Concentrations (Background Report)*, submitted to ECMC on a Form 27 (Document Number 404432981) and approved on January 8, 2026.

Summary of Investigation and Findings

A Parcel Activity Summary Report (PASR) outlining investigative findings at the site was submitted to ECMC on a Form 27 (Document Number 404304908) on August 20, 2025. Grid soil sampling occurred at the property on April 30, 2025, with one discrete grab sample collected per ~9.9-acre grid (total of 1 parent sample), per the Bishop LOC Soil Sampling Locations Plan submitted via Form 27 (Document Number 404175397). Validated analytical data from the Grid samples were submitted to ECMC Form 27 (Document Number 404249538).

1. Analytical Results

- Grid soil sampling identified two locations (T031S003 and T031S005) where all analytes and parameters were within applicable RSSLs and approved background concentration ranges, with the exception of boron (hot water soluble), specific conductance (electrical conductivity (EC)), sodium absorption ratio (SAR) and specific conductance respectively which exceeded the applicable Soil Suitability for Reclamation thresholds in Table 915-1. Exceedances of Table 915-1 Soil Suitability for Reclamation parameters (boron, EC and SAR) were isolated, each occurring in only two samples out of the seven-sample grid dataset. These exceedances were not co-located with petroleum hydrocarbon impacts, and there is no pattern that would suggest that these exceedances are tied to the well as the source. There was no correlation between the RAT observations of hydrocarbons and the two soil suitability exceedance locations. T031S003 is located between an agricultural access road and a large pond, and T031S005 is located between County Road 56 and west of a shallow pond. Di-icing salts used on main roadways have the potential to impact soils and contribute to elevated boron, SAR and EC depending on the composition of the compounds used which can include elevated sodium, carbonates, and other salts. When snow and ice melt, the melt waters often leave behind concentrated salts that were not completely dissolved and carried away in the melting process. This process is similar to what you see in semi-arid regions where high evaporation rates can concentrate these groundwater constituents in surface soils. Due to the proximity of the sample locations to the ponds there is a high probability that evaporation is having an impact on the soil in this area. In total, the boron, SAR and EC exceedances are interpreted as reflective of localized soil chemistry variability rather than release-related soil impacts. Validated analytical data from the grid samples were submitted to ECMC Form 27 (Document Number 404175397).

2. Field Observations and Site Conditions

- A RAT investigation was conducted on April 30, 2025, and two out of 127 observations indicated a possible source material impact. The absence of additional visible impacts in the area and soil sampling results below background or regulatory levels supports the conclusion that the parcel is not impacted.

Conclusion

Based on the results of the site investigation, visual assessments, and soil sampling, Arcadis has determined that Parcel T031 does not exhibit evidence of impact from the Bishop Well Incident. A soil sampling map and validated analytical data tables are attached to this Form 27 Final Closure submittal.

Therefore, Arcadis recommends that Parcel T031 (Remediation Project Number 40909) be granted Final Closure, as all required investigation activities have been completed, and no further action is warranted.