FORM 27 Rev 5/22

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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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 INFORMATON

Name of Operator: NOBLE ENERGY INC Operator No: 100322
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Dan Peterson Email: rbueuf27@chevron.com

Phone Numbers
Phone: (970) 304-5000
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35676 Initial Form 27 Document #: 403791885

PURPOSE INFORMATION

- [ ] Rule 913.c.(1): Pit or Cuttings Trench closure.
- [X] Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- [X] 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.
- [X] 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: 310216 API #: County Name: WELD
Facility Name: DILLARD - USX AB-67N64W 3SWSW Latitude: 40.596226 Longitude: -104.542404
** correct Lat/Long if needed: Latitude: 40.595248 Longitude: -104.544223
QtrQtr: SWSW Sec: 3 Twp: 7N Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 489305 API #: County Name: WELD
Facility Name: Dillard USX AB-67N64W 3SWSW Latitude: 40.595245 Longitude: -104.544505
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWSW Sec: 3 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? Yes

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

Within Pronghorn Winter Concentration Area HPH
Freshwater Emergent Wetland 0.12mi NE, 0.17mi NW, 0.22mi W

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

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.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Dillard-USX AB-67N64W 3SWSW Facility. On 12/11/2024, the tank battery was decommissioned in accordance with ECMC rules. Laboratory soil samples were collected from the partially-buried produced water vessel excavation base (PVW01-B@4' and PWV02-B@4') and sidewalls (PVW01-N@2.5' and PVW02-S@2.5'), from beneath the above-ground storage tanks (AST01@0-6" and AST02@0-6"), and from beneath the separator risers for the dumpline (SEP01-DL@2.5') and flowline (SEP01-FL@2.5'). Samples were collected and field screened from sidewalls of the PVW excavation (PVW01-W@2.5', PVW01-S@2.5', PVW02-N@2.5', and PVW02-E@2.5'), at the emission control device (FLARE01@0-6"), and from the vicinity of infrastructure removed prior to decommissioning (GS01@0-6").

Initial laboratory analytical results indicated that benzo(a)anthracene was detected in excess of ECMC Table 915-1 regulation in sample location AST02@0-6"; this detection was reported as a historic release (Form 19 Document # 404088158). As documented in the COA on Form 27 # 404087667, the initial decommissioning samples were analyzed outside of the specified hold times for EPA Method 8260 per SW-846 (VOCs & GRO) and EPA Method 9045D (pH).

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Soil samples were collected as described in the Initial Action Summary of this Form 27. Sampling deviated from the approved sampling plan in Initial Form 27 Document # 403791885 because the soil samples collected during the initial decommissioning on 12/11/2024 were submitted for all Table 915-1 contaminants, but volatile organic compounds analyzed by EPA Method 8260 were analyzed outside of EPA recommended holding times. These respective tank battery samples are proposed to be recollected, as outlined in the Site Investigation Report of this Form.

Tank battery soil samples will be collected as described in the Initial Action Summary of this Form 27, and 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.

Proposed Groundwater Sampling

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

If groundwater is encountered during the remedial excavation, a grab groundwater sample will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1. This sample analysis includes, but is not limited to: BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260; chloride and sulfate anions by EPA Method 300.0; and total dissolved solids (TDS) by Method SM 2540C.

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):

During decommissioning activities, field personnel screened disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. Confirmation soil samples submitted for laboratory analysis were analyzed for full ECMC Table 915-1 constituents. A detailed summary of the tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to Form 27 # 404087667.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 10
Number of soil samples exceeeding 915-1: 0
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet): 0

NA / ND

-- Highest concentration of TPH (mg/kg): 10.2
-- Highest concentration of SAR: 0.34
BTEX > 915-1: No
Vertical Extent > 915-1 (in feet): 4

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?

[X] Were background samples collected as part of this site investigation?

On 12/12/24, six background soil samples were collected from two discrete locations (BKG01-BKG02). On 10/14/25, ten background soil samples were collected from five discrete locations (BKG03-BKG07). Background soil samples were collected from depths ranging between 0 to 4 feet below ground surface (ft bgs), and were analyzed for Table 915-1 metals, pH, SAR, EC, and boron. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 23.5 mg/kg, 679 mg/kg, and 1.38 mg/kg, respectively. All arsenic, barium, and cadmium concentrations observed during site investigation activities were below background levels.

[ ] Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards):
Volume of liquid waste (barrels):

[X] Is further site investigation required?

Based on the analytical results collected during the October 2025 supplemental site investigation (SSI), the organic compound exceedances observed at decommissioning sample location AST02@0-6" (reported in approved Form 27 Document # 404087667) were successfully delineated. Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, a site investigation will be conducted to recollect out-of-hold samples. Because the initial decommissioning samples were analyzed outside of the allotted hold times, they will be recollected and analyzed for all Table 915-1 contaminants. The proposed soil sampling locations are illustrated in the attached site investigation plan. The investigation will be conducted per the proposed implementation schedule, and the results will be provided in a subsequent Form 27.

The site investigation has been updated from the investigation originally proposed in approved Form 27 # 404356323. The proposed site investigation was updated because out-of-hold decommissioning samples were not collected during the October 2025 SSI. The proposed sampling locations to be recollected are illustrated in 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.

The benzo(a)anthracene exceedance observed at sample location AST02@0-6" will be removed through a remedial excavation.

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.

A Site Assessment was conducted on 10/14/25 to delineate impacted media, during which five soil borings were advanced to depths ranging from 1 to 4 ft. bgs. BH01 was advanced at the same location as soil sample AST02@0-6" to vertically delineate impacts at that location. BH02-BH05 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at AST02@0-6". Soil samples were collected and analyzed for all ECMC Table 915-1 contaminants. Groundwater was not encountered during this assessment. Analytical results from the October 2025 SSI indicated that the impacts at AST02@0-6" were fully delineated.

Remedial excavation confirmation soil samples for AST02@0-6" will be collected and analyzed for all ECMC 915-1 contaminants. The results of the remedial excavation will be submitted on a subsequent Form 27.

A site investigation will be conducted to recollect out-of-hold samples. The proposed soil sampling locations are illustrated in the attached site investigation plan. The investigation will be conducted per the proposed implementation schedule, and the results will be provided in a subsequent Form 27.

Soil Remediation Summary

☐ **In Situ**

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

☐ **Ex Situ**

- _____ Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) _____
  - Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ Excavate and onsite remediation
  - _____ 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 the initial decommissioning or site investigation activities.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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

[X] Other SSI Report, Supplemental Source Mass Removal & Updated SSI 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

E&P waste (solid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

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?

[X] 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. 12/11/2024

Proposed date of completion of Reclamation. 08/18/2027

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. 05/09/2024

Actual Spill or Release date, or date of discovery. 02/10/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/11/2024

Proposed site investigation commencement. 02/18/2026

Proposed completion of site investigation. 02/18/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/18/2026

Proposed date of completion of Remediation. 02/18/2027

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.

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

Basis for change in implementation schedule:

The implementation schedule has been changed due to the completion of the October 2025 supplemental site investigation (SSI) at the Dillard-USX AB-67N64W 3SWSW tank battery and necessity for additional SSI and remedial excavation activities adjacent to the tank battery. The proposed SSI and remedial excavation will be completed following the approval of this form. The SSI is tentatively scheduled for 02/18/2026. The remedial excavation does not have a scheduled date, but is expected to begin in second quarter of 2026. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

OPERATOR COMMENT

This Form 27 is being submitted to include the supplemental site investigation (SSI) results, propose updated SSI and remedial excavation activities for the Dillard-USX AB-67N64W 3SWSW Tank Battery location.

A Site Assessment was conducted on 10/14/25 to delineate impacted media, during which five soil borings were advanced to depths ranging from 1 to 4 ft. bgs. BH01 was advanced at the same location as soil sample AST02@0-6" to vertically delineate impacts at that location. BH02-BH05 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at AST02@0-6". Soil samples were collected and analyzed for all ECMC Table 915-1 contaminants. Groundwater was not encountered during this assessment. Analytical results from the October 2025 SSI indicated that the impacts at AST02@0-6" were fully delineated.

The benzo(a)anthracene exceedance observed at sample location AST02@0-6" will be removed through a remedial excavation. Remedial excavation confirmation soil samples for AST02@0-6" will be collected and analyzed for all ECMC 915-1 contaminants.

On 12/12/24, six background soil samples were collected from two discrete locations (BKG01-BKG02). On 10/14/25, ten background soil samples were collected from five discrete locations (BKG03-BKG07). Background soil samples were collected from depths ranging between 0 to 4 feet below ground surface (ft bgs), and were analyzed for Table 915-1 metals, pH, SAR, EC, and boron. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 23.5 mg/kg, 679 mg/kg, and 1.38 mg/kg, respectively. All arsenic, barium, and cadmium concentrations observed during site investigation activities were below background levels.

Based on the analytical results collected during the October 2025 supplemental site investigation (SSI), the organic compound exceedances observed at decommissioning sample location AST02@0-6" (reported in approved Form 27 Document # 404087667) were successfully delineated. Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, a site investigation will be conducted to recollect out-of-hold samples. Because the initial decommissioning samples were analyzed outside of the allotted hold times, they will be recollected and analyzed for all Table 915-1 contaminants. The proposed soil sampling locations are illustrated in the attached site investigation plan. The investigation will be conducted per the proposed implementation schedule.

The site investigation has been updated from the investigation originally proposed in approved Form 27 # 404356323. The proposed site investigation was updated because out-of-hold decommissioning samples were not collected during the October 2025 SSI. The proposed sampling locations to be recollected are illustrated in 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 remedial excavation and SSI 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: McKenzie Reynolds Title: Environmental Consultant

Submit Date: 12/23/2025 Email: tas-chevron-5@tasman-geo.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: RICK ALLISON Date: 04/29/2026

Remediation Project Number: 35676

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
404471339	FORM 27-SUPPLEMENTAL-SUBMITTED
404473253	LABORATORY ANALYTICAL REPORT
404473369	SITE INVESTIGATION REPORT
404473425	SITE INVESTIGATION PLAN

Total Attach: 4 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)