

State of Colorado
Energy & Carbon Management Commission

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404630010
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Report taken by:
Nick Cholas

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 #: 30388 Initial Form 27 Document #: 403460359

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: 322598	API #: _____	County Name: WELD
Facility Name: ARENS G 22-22D	Latitude: 40.299750	Longitude: -104.642230	
** correct Lat/Long if needed: Latitude: 40.298021		Longitude: -104.640245	
QtrQtr: SENE	Sec: 22	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 489872	API #: _____	County Name: WELD
Facility Name: Grant Arens G 22-22D, 03	Latitude: 40.298158	Longitude: -104.640128	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 22	Twp: 4N	Range: 65W 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? No

Other Potential Receptors within 1/4 mile

Facility and flowline within Aquatic Native Species Conservation Waters
Riverine 50ft E
Emergent wetland 0.16mi NW, 0.16mi NE, 0.22mi E
Farm structures 0.25mi SE
No other potential receptors are located within 1/4 mile of the Site.
Above distances are approximations.

DENIED

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 if encountered
Yes	SOILS	Refer to Tables and Figures	Field Screening and Lab Analysis

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 ARENS GRANT T4N-R65W-S22 L02 Facility and Tank Battery location.

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), and at the separator(s). Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, 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):

Groundwater was not encountered during the site investigation. If encountered, a grab groundwater sample will be collected for Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS).

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 at the tank battery area 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 ECMC Tank Battery and Produced Water Vessel Closure Checklists were utilized and filled out during the abandonment process.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u> 7 </u>	-- Highest concentration of TPH (mg/kg) <u> 2838 </u>
Number of soil samples exceeding 915-1 <u> 3 </u>	-- Highest concentration of SAR <u> 0.874 </u>

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 Yes

Approximate areal extent (square feet) 300

Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? Yes

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

Forty background soil samples were collected between 10/23/2023 and 12/05/2025 from an area not impacted by oil and gas development and at depths and lithologies (SW - well graded sand) 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. Based on the background analytical results summarized below, the following Table 915-1 metals were within the maximum observed background values (metals listed in mg/kg):

- Arsenic Max*1.25 = 14.9
- Barium Max*1.25 = 480
- Cadmium Max*1.25 = 1.36
- Lead Max*1.25 = 36.8
- Selenium Max*1.25 = 0.523

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?

Supplemental source mass removal will be completed to vertically and horizontally delineate the benzene, 1,2,4 trimethylbenzene, naphthalene, TPH, acenaphthene, fluorene, 1-methylnaphthalene, and 2-methylnaphthalene exceedances observed during reclamation activities. A proposed SSMR map was attached to Form 27 document number 404512420. The results of the SSMR will be submitted on a subsequent Form 27.

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 benzene, 1,2,4 trimethylbenzene, naphthalene, TPH, acenaphthene, fluorene, 1-methylnaphthalene, and 2-methylnaphthalene exceedances observed at GRANT ARENS 02 facility, sample locations (SS-01 2Ft, SS01-N@4', SS01-N1@8', and SS01-N2@8') discovered on 2/10/25 and 12/01/25 will be removed through a remedial excavation in accordance with the proposed excavation map attached to Form 27 document number 404512420. Soil samples will be collected from the base and sidewalls of the respective final excavation extents and will be submitted for analysis of the full ECMC Table 915-1 suite. The impacted soil will be disposed of at an approved landfill as non-hazardous waste in accordance with ECMC Rules 905 and 906.

REMEDICATION 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.

Laboratory analytical results confirmed a historical release at the location of soil sample SS-01 2Ft. A site investigation was completed on December 1, 2025, details are provided within Form 27 document number 404512420. Soil samples were collected to delineate the horizontal and vertical extent of the impacts. The SSI confirmation samples' laboratory results indicate organic petroleum impacts are present at the SS-01 2Ft, SS01-N1@4', SS01-N1@8', and SS01-N2@8' sample locations.

Based on the findings, the Operator proposes remedial excavation to remove soil impacts. The excavation is proposed to measure 40'x15'x12' based on lab analysis and field screen data. The source will be excavated, and confirmation soil samples will be collected and analyzed for the Full Table 915-1 suite of analytes. See attached figures for proposed excavation extent.

If groundwater is encountered during the excavation of soil, a groundwater sample will be collected for Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion, and Total Dissolved Solids (TDS). Should no additional active remediation be required following source removal at the location, a no further action (NFA) determination will be requested within 90 days following laboratory confirmation of the removal of impacted soils with respect to the applicable Table 915-1 screening levels at the site.

If groundwater impacts are observed, an NFA will be requested once four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents below regulatory limits. As needed, soil and/or groundwater remediation plans will be developed and submitted to ECMC in a supplemental Form 27.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ 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 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? 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? 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. 10/30/2025

Proposed date of completion of Reclamation. 10/30/2027

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. 02/09/2022

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). 11/06/2023

Proposed site investigation commencement. 08/22/2023

Proposed completion of site investigation. 05/28/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/20/2026

Proposed date of completion of Remediation. 12/20/2026

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:

OPERATOR COMMENT

This Form 27 is being submitted to include a 2Q 2026 timeline update for the GRANT ARENS 02 facility (REM #30388). Site investigation activities were conducted pertaining to the GRANT ARENS 02 facility on 12/01/2025. Excavation is being scheduled and is expected to occur within Q3 2026.

A supplemental site investigation (SSI) was conducted on 12/01/2025 to delineate the vertical and lateral extent of soil impacts identified during reclamation activities conducted at the former Grant Arens G22-22D, 03 tank battery (REM 30388) location on 2/10/2025. Confirmation soil samples were collected and analyzed for the full Table 915-1 analyte suite. Groundwater was not encountered during SSI activities. Background samples were collected and analyzed for ECMC Table 915-1 Metals and SSR constituents.

Laboratory analytical results confirmed a historical release at the location of soil sample SS-01 2Ft. A site investigation was completed on December 1, 2025, details are provided within this Form 27. Soil samples were collected to delineate the horizontal and vertical extent of the impacts. The SSI confirmation samples' laboratory results indicate organic petroleum impacts at the SS01-N1 @4', SS01-N1 @8', and SS01-N2 @8' sample locations.

Based on the findings, the Operator proposes remedial excavation to remove soil impacts. The excavation is proposed to measure 40'x15'x12' based on lab analysis and field screen data. The source will be excavated, and confirmation soil samples will be collected and analyzed for the Full Table 915-1 suite of analytes.

If groundwater is encountered during the excavation of soil, a groundwater sample will be collected for Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5 Trimethylbenzene, Chloride ion, Sulfate ion, and Total Dissolved Solids (TDS). Should no additional active remediation be required following source removal at the location, a no further action (NFA) determination will be requested within 90 days following laboratory confirmation of the removal of impacted soils with respect to the applicable Table 915-1 screening levels at the site.

If groundwater impacts are observed, an NFA will be requested once four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents below regulatory limits. As needed, soil and/or groundwater remediation plans will be developed and submitted to ECMC in a supplemental Form 27.

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: 04/27/2026

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: 30388

COA Type

Description

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

404630010	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
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>	04/30/2026

Total: 1 comment(s)

DENIED