

State of Colorado
Energy & Carbon Management Commission

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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 INFORMATION

Name of Operator: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers Phone: (970) 304-5000 Mobile: ()
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Dan Peterson	Email: RBUEUF27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35726 Initial Form 27 Document #: 403748270

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: 302633	API #: _____	County Name: WELD
Facility Name: DILLARD 10-44	Latitude: 40.582250	Longitude: -104.528480	
** correct Lat/Long if needed: Latitude: 40.582305		Longitude: -104.526276	
QtrQtr: SESE	Sec: 10	Twp: 7N	Range: 64W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 488901	API #: _____	County Name: WELD
Facility Name: Dillard 10-44	Latitude: 40.582466	Longitude: -104.526246	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 10	Twp: 7N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 489071 API #: County Name: WELD
Facility Name: DILLARD 10-44 Latitude: 40.582529 Longitude: -104.526344
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESE Sec: 10 Twp: 7N Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Rangeland
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

Pronghorn Winter Concentration Area (1202.d)
Riverine 355ft SW, Stream/River 365ft SW, Lake/Pond 340ft SW, 0.10mi S, 0.16mi NW
Oil & Gas Structure 0.25 NE
Active PD Colony within 660ft

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 during the decommissioning of the Dillard 10-44 Tank Battery on 12/20/24. Laboratory soil samples were collected from the base of the produced water vessel excavation (PVW01-B@4') and N, W, S, & E sidewalls (PVW01-N@2.5' - PVW01-S@2.5'). Laboratory soil samples were collected from the above ground storage tank (AST) excavation base (AST01-B@4') and N, W, S, & E sidewalls (AST01-N@2.5' to AST01-S@2.5'). Lab samples were collected beneath the separator risers at the dump line (SEP01-DL@3') and flowline (SEP01-FL@3'). A field screening sample was collected beneath the flare (FLARE01@0-6"). Lab sample WC01@0-6" was collected following the discovery of soils exhibiting hydrocarbon odors at ground surface, approximately 15' SW of sample AST01-E. Due these field indicators, sample location WC01 was reported as a potential historical release in Form 19 # 404039362 (Spill ID # 488901). Following the receipt of the analytical results, sample locations AST01-E, PVW01-B, & PVW01-E exhibited concentrations of Table 915-1 organics exceeding regulatory standards. These historic releases were reported in Form 19 # 404058032 (Spill ID # 489071).

Sample locations WC01, AST01-E, PVW01-B, & PVW01-E exhibited concentrations of Table 915-1 organic compounds in excess of regulatory standards. The releases were reported in Form 19 # 404058352 (Spill ID # 489071) and Form 19 # 404039362 (Spill ID # 488901). Groundwater was not encountered during decommissioning.

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):

Sampling deviated from the sampling plan proposed in Initial Form 27 # 403748270; two surface samples were unable to be taken and additional locations were sampled beneath the AST due to necessity for excavation to retrieve and remove an oil dump line. Infrastructure present at the facility upon arrival included the AST, produced water vessel, separator, and a flare. All sampling was conducted in accordance to the Initial Action Summary of this Form 27. 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), Table 915-1 organic compounds, EC, SAR, pH, metals, and boron.

Proposed Groundwater Sampling

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

If groundwater is encountered during a future site investigation, a 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):

Visual inspection at the tank battery area occurred during decommissioning activities. Field personnel screened disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of the tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to a previous Form 27 (Form 27 # 404039219).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 17

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 22.4

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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?

A total of 30 backgrounds were collected near the Dillard 10-44 Facility and the Dillard 10-44 Flowline (REM # 35728). Samples were collected from 11 discrete soil borings at depths ranging between 0' and 9.5' below ground surface (bgs). Backgrounds were analyzed for Table 915-1 metals, pH, EC, SAR, and boron. The background collected from 0-0.5 ft bgs (BKG01 @0-6") is not used for comparison to site concentrations. The maximum background concentrations for pH, EC, and SAR were observed to be 8.74, 13.4 mmhos/cm, and 22.8, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 20.1 mg/kg, 228 mg/kg, and 1.18 mg/kg, respectively. The results of the background analysis are discussed in the Remedial Action Plan of this Form 27.

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?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Between 08/15/25 - 08/19/25, a remedial excavation was conducted to remove the impacted soil at the produced water vessel (PWV01-E@2.5', PWV01-B@4') location. Six confirmation soil samples (PWV01-SS01 - PWV01-SS06) were collected from the sidewalls of the excavation from approximately 3 feet below ground surface (ft bgs), and two confirmation soil samples (PWV01-FS01, PWV01-FS02) were collected from the base of the excavation at approximately 6 ft. bgs. The final extent of the excavation was approximately 20 ft by 28.5 ft by 6 ft bgs. Approximately 280 cubic yards of impacted soil was removed and transported off site for disposal under Operator waste manifests to the Buffalo Ridge Landfill.

Between 08/20/25 - 08/25/25, a subsequent remedial excavation was conducted to remove the impacted soil at the above ground storage tank (AST01-E@2.5', WC01@0-6"). Seven confirmation soil samples (AST01-SS01 - AST01-SS07) were collected from the sidewalls of the excavation from approximately 3 ft bgs, and two confirmation soil samples (AST01-FS01, AST01-FS02) were collected from the base of the excavation from approximately 6 ft. bgs. The final excavation was approximately 28 ft by 28 ft by 6 ft bgs. Approximately 300 cubic yards of impacted soil was removed and transported off site for disposal under Operator waste manifests to the Buffalo Ridge Landfill.

Analytical results from the samples collected at the final excavation extent indicate that the Table 915-1 organic compounds were successfully removed. Groundwater was not encountered during either 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.

Following the 3Q25 excavation effort, concentrations of Table 915-1 organic compounds are within regulatory standards and site concentrations of inorganics and metals are below background levels. Analytical results indicate the 3Q25 excavations successfully removed the hydrocarbon impacts discovered during decommissioning. The in-situ concentrations of pH, EC, SAR, arsenic, barium, and selenium exceeding regulatory standards are below background levels. Therefore the elevated concentrations of Table 915-1 inorganics and metals can be attributed to native soil conditions. No further remedial action is required, as such the Operator is requesting a No Further Action (NFA) designation for the Dillard 10-44 Tank Battery.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Yes Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 580

_____ 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 tank battery decommissioning or remedial excavation activities.

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

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: \$ 0

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:

Volume of E&P Waste (solid) in cubic yards 580

E&P waste (solid) description Hydrocarbon Impacted Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Buffalo Ridge Landfill

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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. 12/20/2024

Proposed date of completion of Reclamation. 08/30/2026

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. 12/20/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/20/2024

Proposed site investigation commencement. 08/15/2025

Proposed completion of site investigation. 01/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/30/2026

Proposed date of completion of Remediation. 01/30/2026

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:

No additional investigation is required at this time. The proposed completion of remediation date has been updated to the date of this submittal.

OPERATOR COMMENT

This Form 27 is being submitted to request a No Further Action (NFA) designation for the Dillard 10-44 Tank Battery. A comprehensive data packet summarizing the decommissioning activities, background site investigation data, and corresponding laboratory reports have been attached to this Form 27.

Following the 3Q25 excavation effort, concentrations of Table 915-1 organic compounds are within regulatory standards and site concentrations of inorganics and metals are below background levels. Analytical results indicate the 3Q25 excavations successfully removed the hydrocarbon impacts discovered during decommissioning. The in-situ concentrations of pH, EC, SAR, arsenic, barium, and selenium exceeding regulatory standards are below background levels. Therefore the elevated concentrations of Table 915-1 inorganics and metals can be attributed to native soil conditions. No further remedial action is required, as such the Operator is requesting a No Further Action (NFA) designation for the Dillard 10-44 Tank Battery.

Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical reports from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original reports with additional protections (E5C0837, DA74460, DA74472, DA74544). The Reissued Reports were received directly from the labs on 01/16/2026 and 01/28/2026, respectively, which includes a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance (Origins) or the application of a Digital ID/Verified Certification (lock) to support reissuance (SGS). The metadata associated with these Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Reports are attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information responsive to ECMC's general comments.

A technical review of the laboratory analytical data associated with this Site was conducted. This review was conducted by our environmental consultant's internal Compliance Team, working independently of the Site Project Team. The review consisted of: verification of receipt of locked/encrypted lab reports from the contract analytical lab; evaluation and verification that reported laboratory results are consistent with the data presented throughout the eForm text, tables, & figures.

Based on field observations and laboratory analytical results obtained during site investigation, additional remedial actions are not warranted. The Operator is requesting a No Further Action designation for this site.

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: 02/17/2026

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: 05/05/2026

Remediation Project Number: 35726

COA Type

Description

COA Type	Description
1 COA	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>

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
404492770	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
404528835	LABORATORY ANALYTICAL REPORT
404528892	LABORATORY ANALYTICAL REPORT
404528893	LABORATORY ANALYTICAL REPORT

404528894	LABORATORY ANALYTICAL REPORT
404528927	LABORATORY ANALYTICAL REPORT
404528930	LABORATORY ANALYTICAL REPORT
404528931	LABORATORY ANALYTICAL REPORT
404547918	SITE INVESTIGATION REPORT
404646621	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 10 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)