

State of Colorado
Energy & Carbon Management Commission

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404646700
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05/14/2026

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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Erica Zuniga</u>	Email: <u>RBUEUF27@chevron.com</u>	Phone: <u>(970) 304-5000</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20984 Initial Form 27 Document #: 402872769

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: <u>LOCATION</u>	Facility ID: <u>326910</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>TREBOR-65N64W 14SWNW</u>	Latitude: <u>40.402240</u>	Longitude: <u>-104.524720</u>	
	** correct Lat/Long if needed: Latitude: <u>40.402325</u>	Longitude: <u>-104.525088</u>	
QtrQtr: <u>SWNW</u>	Sec: <u>14</u>	Twp: <u>5N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>481213</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Trebor B 14-5 Tank Battery</u>	Latitude: <u>40.402325</u>	Longitude: <u>-104.525088</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>14</u>	Twp: <u>5N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Crop Land _____

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

High Priority Habitat - Aquatic Native Species Conservation Waters
Freshwater Pond 0.1mi NE, 0.07mi W
Riverine 0.04mi S, 0.05/0.09/0.13mi SW, 0.12mi W
Residential 0.09/0.1mi SE
Riparian Forested Shrub 0.21mi SE, 0.1mi S, 0.03/0.06mi SW, 0.06mi W
Riparian Herbaceous 0.16/0.25mi S, 0.2mi SW
Freshwater Forested Shrub Wetland 0.22mi SE

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	Not Impacted	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.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Trebor B 14-5 facility and tank battery. The facility and tank battery were decommissioned per ECMC rules on 11/30/2021. Grab soil samples were collected at the produced water vessels excavation, the oil-water separator, and the above ground oil tank. Additionally, soil samples were field screened at the N-E-S-W sidewalls of the produced water tank excavation.

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):

A grab soil sample was collected at the base of the wellhead excavation. Four grab soil samples were collected at the tank battery and produced water vessels. Soil samples collected were analyzed by a certified laboratory for Table 915-1 organics and inorganics 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):

One monitoring well (SB-01-GW) was installed at the site on 2/24/2022, and was sampled on a quarterly basis for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene.

During the 4Q 2022, four consecutive quarters of organic compound concentrations in compliance with the applicable ECMC Table 915-1 regulatory standards were achieved. ECMC approved the request to discontinue groundwater monitoring at this remediation project within Approved Doc. #403257733.

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 of the wellhead and flowline areas occurred during decommissioning activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 11 -- Highest concentration of TPH (mg/kg) 381
 Number of soil samples exceeding 915-1 3 -- Highest concentration of SAR 51
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No
 Approximate areal extent (square feet) 300 Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 0 ND Highest concentration of Benzene (µg/l) _____
 Was extent of groundwater contaminated delineated? Yes -- Highest concentration of Toluene (µg/l) 6.65
 Depth to groundwater (below ground surface, in feet) 19 -- Highest concentration of Ethylbenzene (µg/l) 1.72
 Number of groundwater monitoring wells installed 1 -- Highest concentration of Xylene (µg/l) 10.9
 Number of groundwater samples exceeding 915-1 0 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?
 During the initial decommissioning conducted on 11/30/2021, 1 background was collected (Background-01@2') between approximately 0-6 inches (in) to 4 feet below ground surface (ft bgs). On 2/10/2022, 1 background was collected (Background-02@5-7.5') between 5 and 7.5 ft bgs. On 1/28/2026, an additional 14 background samples were collected from 7 soil borings (BG-03 - BG-07). The backgrounds were collected from depths ranging approximately 0 to 10 ft bgs. All background samples collected were analyzed for pH and arsenic in soil per ECMC Table 915-1. The maximum background concentration for pH was observed to be 8.59 standard units. The maximum background concentrations with a 1.25x multiplier applied for arsenic was calculated to be 5.887 mg/kg. WV-SS-04@6', WV-FS-01@7', TB-SS-01@1', SB-01@7.5-10', SB-03@7.5-10', and SB-04@5-7.5' were observed to be in exceedance of Table 915-1 PGSSLs and native soil background concentrations for pH and SAR.

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?
 The SAR exceedance observed at sample location SB-01@7.5-10' during the WV-FS-01@7' delineation sampling will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. The 1,2,4-Trimethyl-Benzene, naphthalene, 1-methyl-naphthalene, 2-methyl-naphthalene, and pH in soil sample location WV-FS-01@7' and WV-SS-04@6' will be encompassed within the remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrent with remedial excavation activities, a minimum of five additional background soil samples will be collected and analyzed for inorganic and metal constituents per ECMC Table 915-1 to further evaluate whether the observed pH and SAR exceedances are attributable to native soil conditions. The proposed remedial excavation limits and background sample locations are provided in the attached figure.

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.
 The SAR exceedance identified following the WV-FS-01@7' delineation sampling conducted on 1/28/2026, at sample location SB-01@7.5-10' will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. The 1,2,4-Trimethyl-Benzene, naphthalene, 1-methyl-naphthalene, 2-methyl-naphthalene, and pH in soil sample location WV-FS-01@7' and WV-SS-04@6' will be encompassed within the remedial excavation. The excavation size is anticipated to be 15 feet (ft) x 15ft x 12ft. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

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.

The SAR exceedance observed at sample location SB-01@7.5-10' during the WV-FS-01@7' delineation sampling will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. The 1,2,4-Trimethyl-Benzene, naphthalene, 1-methyl-naphthalene, 2-methyl-naphthalene, and pH in soil sample location WV-FS-01@7' and WV-SS-04@6' will be encompassed within the remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrent with remedial excavation activities, a minimum of five additional background soil samples will be collected and analyzed for inorganic and metal constituents per ECMC Table 915-1 to further evaluate whether the observed pH and SAR exceedances are attributable to native soil conditions. The proposed remedial excavation limits and background sample locations are provided in the attached figure.

Soil Remediation Summary

In Situ

Ex Situ

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

- _____ 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.

One monitoring well (SB-01-GW) was installed at the site on 2/24/2022, and was sampled on a quarterly basis for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene.

During the 4Q 2022, four consecutive quarters of organic compound concentrations in compliance with the applicable ECMC Table 915-1 regulatory standards were achieved. ECMC approved the request to discontinue groundwater monitoring at this remediation project within Approved Doc. #403257733.

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 SSI Summary, SSMR/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? 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. 02/28/2027

Proposed date of completion of Reclamation. 12/31/2029

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. 11/29/2021

Actual Spill or Release date, or date of discovery. 12/13/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/30/2021

Proposed site investigation commencement. 11/30/2021

Proposed completion of site investigation. 01/28/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/28/2026

Proposed date of completion of Remediation. 02/19/2027

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 implementation schedule has been changed due to the completion of initial decommissioning and SSI activities at the Trebor B 14-5 facility and tank battery, as well as the necessity for additional remedial excavation and site investigation activities adjacent to site. The proposed site investigation is tentatively scheduled for completion by the end of 3Q 2026. The remedial excavation work is expected to commence by the end of 3Q 2026. The ECMC will be notified of any updates to the implementation schedule on a subsequent Form 27.

OPERATOR COMMENT

This Form 27 is submitted to provide a 2Q 2026 SSI soil sampling summary for the Trebor B 14-5 (REM #20984), and to propose both Source Soil Mass Removal (SSMR) and SSI activities.

An SSI was conducted on 1/28/2026, including the collection of 14 background soil samples. The back samples were collected from 7 soil borings (BG-03 - BG-07). The backgrounds were collected from depths ranging approximately 0 to 10 ft bgs. All background samples collected were analyzed for pH and arsenic in soil per ECMC Table 915-1. The maximum background concentration for pH was observed to be 8.59 standard units. The maximum background concentrations with a 1.25x multiplier applied for arsenic was calculated to be 5.887 mg/kg. WV-SS-04@6', WV-FS-01@7', TB-SS-01@1', SB-01@7.5-10', SB-03@7.5-10', and SB-04@5-7.5' were observed to be in exceedance of Table 915-1 and native soil background concentrations for pH and SAR.

The SAR exceedance observed at sample location SB-01@7.5-10' during the WV-FS-01@7' delineation sampling will be removed through a remedial excavation and the impacted soil will be segregated for proper off-site disposal. The 1,2,4-Trimethyl-Benzene, naphthalene, 1-methyl-naphthalene, 2-methyl-naphthalene, and pH in soil sample location WV-FS-01@7' and WV-SS-04@6' will be encompassed within the remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrent with remedial excavation activities, a minimum of five additional background soil samples will be collected and analyzed for inorganic and metal constituents per ECMC Table 915-1 to further evaluate whether the observed pH and SAR exceedances are attributable to native soil conditions. The proposed remedial excavation limits and background sample locations are provided in the attached figure.

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 will be submitted within 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: Richie Blessing

Title: Environmental Consultant

Submit Date: 05/14/2026

Email: NorthernColoradoPM@montrose-env.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: 05/15/2026

Remediation Project Number: 20984

COA Type**Description**

	Pursuant to Rule 913.e, quarterly reporting will continue until closure criteria are achieved for the remediation project. The results of the remedial excavation activities will be submitted under a subsequent Form 27.
1 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**

404646700	FORM 27-SUPPLEMENTAL-SUBMITTED
404647961	LABORATORY ANALYTICAL REPORT
404649089	SITE INVESTIGATION PLAN
404651621	SITE INVESTIGATION REPORT

Total Attach: 4 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)