

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404657081

Receive Date:

Report taken by:

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 ECOM 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 #: 26233 Initial Form 27 Document #: 403238539

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: WELL | Facility ID: _____ | API #: 123-38222 | County Name: WELD |
| Facility Name: Reliance E 23-63-1HNC | Latitude: 40.467550 | Longitude: -104.621760 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SESE | Sec: 23 | Twp: 6N | Range: 65W Meridian: 6 Sensitive Area? Yes |
| Facility Type: SPILL OR RELEASE | Facility ID: 483837 | API #: _____ | County Name: WELD |
| Facility Name: Reliance E 23-63-1HNC | Latitude: 40.467550 | Longitude: -104.621760 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SESE | Sec: 23 | Twp: 6N | Range: 65W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications CL 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

Freshwater emergent wetlands are 0.16 miles, 0.17 miles, and 0.25 miles southwest and Darlin Reservoir is 0.22 miles southwest of the Location. Multiple DWR wells are within 0.25 miles of the Location; the closest permitted well being 36534--A, 0.11 miles to the southeast. Residential structures are 0.20 miles south and 0.18 miles southeast, and farm structures are 0.18 to 0.20 miles southwest of the Location.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

DESCRIPTION OF IMPACT

| Impacted? | Impacted Media | Extent of Impact | How Determined |
|--------------|----------------|-----------------------------|---|
| UNDETERMINED | GROUNDWATER | NA | Field-Screening and Laboratory Analysis, if Encountered |
| Yes | SOILS | Refer to Tables and Figures | Field-Screening and Laboratory 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.

Pursuant to ECOM Rule 911, site assessment activities were completed for the Reliance E #23-63-1HNC wellhead cut and cap and flowline abandonment. On January 25, 2023, five samples were collected: from the excavation base and each sidewall. Samples were analyzed for Table 915-1 organic and Soil Suitability for Reclamation (SSR) constituents, except for the base (WH-FS-01) and south sidewall (WH-SS-03) samples, which were submitted for full Table 915-1 analysis. Laboratory results reported exceedances of benzene, 1,3,5-trimethylbenzene, naphthalene, 1-methylnaphthalene, pH, arsenic, barium, copper, and selenium. These samples have been included in Chevron's data integrity review, and material from these locations has been characterized in accordance with the approved Form 27 investigation plan. The samples are invalid; they will not be used for site compliance. Since organic exceedances were documented, Form 19 Document 403309565 was submitted to open and subsequently close Spill ID 483837 onto Remediation Project 26233.

On April 24, 2023, 3,058 feet of flowline was abandoned in place, and the ECOM was notified via Form 44 Document 403540450. Two samples were collected at the flowline end points and analyzed for Table 915-1 organic and SSR constituents: at the wellhead (FL01-B) and the separator (FL01-A). Laboratory results were compliant with applicable standards. As the samples were not analyzed for Table 915-1 metals, material was resampled to obtain full characterization. See Document 403725235 for details.

On February 18, 2026, seven samples were collected to characterize previously sampled material: five at the wellhead and two at the flowline endpoints. Additionally, three samples were collected to delineate organic exceedances reported at WH-SS-03. Samples were submitted for full Table 915-1 analysis. Laboratory results reported exceedances of arsenic, barium, hexavalent chromium, lead, and selenium. See attached laboratory data summary tables for details.

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):

Excavation is proposed to address the remaining organics exceedances in samples WH-SS-03 and WH-FS-01 and elevated barium in sample WH01-E. Confirmation samples will be collected from the base and sidewalls of the remedial excavation. Additional soil samples will also be collected to characterize soil conditions along the flowline at directional changes, as outlined in the previous proposed sampling plan. Soil samples will be submitted for full Table 915-1 analysis. Additional background samples will also be collected to establish the natural range of values for inorganic constituents in the project area. See the attached diagram for the proposed excavation extent and proposed soil sample locations.

Proposed Groundwater Sampling

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

No groundwater has been encountered during site investigation activities. If groundwater is encountered, a grab groundwater sample will be collected and submitted for full Table 915-1 analysis.

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):

Field personnel will field-screen all disturbance areas using visual and olfactory senses to determine if laboratory analysis is required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 10
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 100

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 4.36
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 9

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 background sample was collected on January 25, 2023. This sample was included in Chevron's data integrity review and was discovered to have been collected in an area previously disturbed by oil and gas operations. As a result, this sample is not considered representative of natural soil conditions and will be excluded from site compliance evaluations. See Document 403725235.

On April 24, 2024, and February 26, 2026, 18 background samples were collected from nearby, undisturbed areas at comparable depths and soil types to the investigation area samples and were submitted for analysis of Table 915-1 inorganics (SSR and metal constituents). The maximum recorded background pH is 8.85. The maximum calculated background concentrations, with a 1.25x multiplier applied for metals, are 7.59 mg/kg arsenic, 330 mg/kg barium, 0.880 mg/kg hexavalent chromium, 20.0 mg/kg copper, 18.8 mg/kg lead, and 0.399 mg/kg selenium. See Document 403725235 and attached laboratory summary tables for details.

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?

Excavation is proposed to address the remaining organics exceedances in samples WH-SS-03 and WH-FS-01 and elevated barium in sample WH01-E. Confirmation samples will be collected from the base and sidewalls of the remedial excavation. Additional soil samples will also be collected to characterize soil conditions along the flowline at directional changes, as outlined in the previous proposed sampling plan. Soil samples will be submitted for full Table 915-1 analysis. Additional background samples will also be collected to establish the natural range of values for inorganic constituents in the project area. See the attached diagram for the proposed excavation extent and proposed soil sample locations.

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.

A remedial excavation is proposed to remove the remaining organics exceedances in samples WH-SS-03 and WH-FS-01 and elevated barium in sample WH01-E. Following excavation, samples will be collected from the base and sidewalls and submitted for full Table 915-1 analysis.

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 remedial excavation is proposed to remove the remaining organics exceedances in samples WH-SS-03 and WH-FS-01 and elevated barium in sample WH01-E. Following excavation, samples will be collected from the base and sidewalls and submitted for full Table 915-1 analysis.

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 decommissioning efforts or subsequent site investigation 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 Quarterly Update, SSI Report, SSMR, and SSIP

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 the 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 to be completed 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. 10/31/2026

Proposed date of completion of Reclamation. 10/31/2028

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. 10/31/2022

Actual Spill or Release date, or date of discovery. 02/01/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/25/2023

Proposed site investigation commencement. 01/25/2023

Proposed completion of site investigation. 09/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/30/2026

Proposed date of completion of Remediation. 03/31/2027

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 adjusted to reflect the status of site investigation efforts and anticipated dates for completion. Additional site investigation to excavate and confirm the removal of organics and barium exceedances, to characterize material from direction change points along the flowline, and to establish the range of values for naturally occurring inorganic constituents in the project area is tentatively scheduled to be completed by the end of the third quarter of 2026, and results will be reported in a subsequent Form 27.

OPERATOR COMMENT

This form has been submitted to satisfy the quarterly reporting requirement for the Reliance E #23-63-1HNC (Remediation Project 26233), provide details of site investigation activities completed on February 18 and 26, 2026, and propose additional investigation activities, including supplemental source mass removal.

On February 18, 2026, soil sampling was conducted to recollect flowline samples for full 915-1 analysis and to delineate organic exceedances reported at the WH-SS-03 sample location. Seven samples were collected to characterize previously sampled material: five at the wellhead and two at the flowline endpoints. Additionally, three samples were collected to vertically and horizontally delineate exceedances of benzene, 1,3,5-trimethylbenzene, naphthalene, and 1-methylnaphthalene reported at WH-SS-03. Samples were submitted for full Table 915-1 analysis. Laboratory results reported exceedances of arsenic, barium, hexavalent chromium, lead, and selenium. On February 26, 2026, three background samples were collected from nearby, undisturbed locations and submitted for analysis of Table 915-1 inorganics. Laboratory results reported elevated values of arsenic, barium, and hexavalent chromium. See the attached laboratory data summary tables for details.

Due to active pipeline installation operations taking place within the site investigation area, the full scope of work proposed in Document 404523414 (In Process) was not completed. Additional soil samples will be collected to characterize soil conditions along the flowline at directional changes, as outlined in the previous proposed sampling plan. Additional background samples will also be collected to further establish the range of values for naturally occurring inorganic constituents in the project area. Additionally, to address the remaining organics exceedances in samples WH-SS-03 and WH-FS-01 and elevated barium in sample WH01-E, an estimated 10 cubic yards of soil will be excavated from the wellhead investigation area and transported to a licensed disposal facility. Following excavation, confirmation sampling will be completed to confirm the absence of impacted soil within the investigation area. The proposed excavation and sampling plan is tentatively planned to be completed by the end of the third quarter of 2026, in accordance with the proposed implementation schedule and diagram attached to this form submittal. The results will be submitted in a subsequent Form 27. Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Holly Tignac _____

Title: Project Scientist _____

Submit Date: _____

Email: CVX-REMS@confluence-cc.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: 26233 _____

| <u>COA Type</u> | <u>Description</u> |
|-----------------|--------------------|
| 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.

| <u>Att Doc Num</u> | <u>Name</u> |
|--------------------|------------------------------|
| 404657140 | LABORATORY ANALYTICAL REPORT |
| 404657141 | LABORATORY ANALYTICAL REPORT |
| 404672259 | SITE INVESTIGATION REPORT |

Total Attach: 3 Files

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|-------------------|----------------|---------------------|
| | | Stamp Upon Approval |

Total: 0 comment(s)