

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

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Receive Date:

03/05/2025

Report taken by:

Chris Sanchez

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) 313-5582
City: DENVER	State: CO	Zip: 80202
Contact Person: Jason Davidson	Email: jason.davidson@chevron.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33387 Initial Form 27 Document #: 403604528

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 #: 123-23268	County Name: WELD
Facility Name: DR JOE CC 6-9	Latitude: 40.338970	Longitude: -104.472890	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 6	Twp: 4N	Range: 63W
Meridian: 6	Sensitive Area? Yes		

Facility Type: SPILL OR RELEASE	Facility ID: 488497	API #: _____	County Name: WELD
Facility Name: Dr Joe CC06-09	Latitude: 40.338961	Longitude: -104.472873	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 6	Twp: 4N	Range: 63W
Meridian: 6	Sensitive Area? Yes		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>489062</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>Dr Joe CC 06-09</u>		Latitude: <u>40.338458</u>		Longitude: <u>-104.472739</u>			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: <u>NESE</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>63W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>489067</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>DR JOE CC 6-9</u>		Latitude: <u>40.336564</u>		Longitude: <u>-104.471872</u>			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: <u>NESE</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>63W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>489104</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>DR JOE CC 6-9</u>		Latitude: <u>40.336208</u>		Longitude: <u>-104.471507</u>			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: <u>NESE</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>63W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>489105</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>DR JOE CC 6-9</u>		Latitude: <u>40.337188</u>		Longitude: <u>-104.472294</u>			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: <u>NESE</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>63W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>489106</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>DR JOE CC 6-9</u>		Latitude: <u>40.337593</u>		Longitude: <u>-104.472432</u>			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: <u>NESE</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>63W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>489107</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>DR JOE CC 6-9</u>		Latitude: <u>40.338079</u>		Longitude: <u>-104.472601</u>			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: <u>NESE</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>63W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

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

Well Within Bald Eagle Active Nest Site 0.5mi Buffer HPH
 Bald Eagle Active Nest Site 0.25mi Buffer HPH 0.22mi NE
 Pronghorn Winter Concentration Area HPH 0.16mi NE
 Riverine 0.02mi NW, 0.23mi NE
 Apparent Pond 0.11mi SW, 0.14mi NW
 Residential 0.16mi SE, 0.15/0.16mi NE
 Farm Structure 0.19mi SE, 0.13/0.17/0.19mi NE

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

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Dr Joe CC 6-9 wellhead cut and cap and flowline removal. On 11/14/25, the wellhead was cut and capped per ECMC rules. Laboratory results indicated that organic impacts were detected in soil samples WH01@6' and FLR01@4', in exceedance of ECMC Table 915-1 regulation and were reported as a historic release (Form 19 Doc# 403996715). A detailed summary of the wellhead decommissioning activities and a proposal for remedial excavation was submitted on January 16, 2025 (Form 27 Doc# 403996197).

An investigation was conducted from 1/15/25 to 1/22/25, related to ~ 1149' of removed flowline. Laboratory soil samples were taken along the flowline at directional changes; a single sample was field screened (FL01-07@2'). During decommissioning, sample locations FL01R-W@4' and FL01-09@3' exhibited elevated PIDs and were reported as historic releases (Form 19 Doc# 403996715 and 404061560). These locations were preliminarily excavated and soil samples were collected from the base (FS01-FLR-W@6' and FS01-FL01-09@5') and sidewalls (SS01-FLR-W@2.5' to SS04-FLR-W@2.5', and SS01-FL01-09@2.5' to SS04-FL01-09@2.5') and submitted for laboratory analysis. Base and sidewall excavation analytical results indicated that 1,2,4-trimethyl-benzene (TMB) and 1,3,5-TMB were detected in exceedance of ECMC Table 915-1 regulation in sample location SS03-FL01-09@2.5'.

Laboratory results indicated that 1,2,4-TMB, naphthalene, total petroleum hydrocarbons (TPH), benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and 1- methyl naphthalene (M), were detected in exceedance of ECMC Table 915-1 regulation in sample locations FL01-01@3', FL01-03@2', FL01-05@4', FL01-06@4', and FL01-08@1', and were reported as historic releases (Form 19 Doc# 404065442, 404062247, 404065952, 404065994, and 404066067, respectively).

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):

Soil samples were collected as described in the Initial Action Summary of this Form 27. Soil samples were analyzed by a certified laboratory, using approved ECMC laboratory analysis methods, for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

Sampling deviated from the approved sampling plan because an additional laboratory sample was collected along the flowline and at the flowline riser (FLR01@4'), and several laboratory samples to be collected at directional changes in the flowline were collected at different locations than shown on the approved plan.

Proposed Groundwater Sampling

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

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

Proposed Surface Water Sampling

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

Additional Investigative Actions

☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Visual inspection of the wellhead and flowline areas occurred during abandonment activities. Field personnel field screened disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. Confirmation soil samples submitted for laboratory analysis were analyzed for full ECMC Table 915-1 constituents. A detailed summary of the wellhead decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was submitted as an attachment to Form 27 # 403996197. A detailed summary of the flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 19

Number of soil samples exceeding 915-1 10

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

Approximate areal extent (square feet) 1000

NA / ND

-- Highest concentration of TPH (mg/kg) 6500

-- Highest concentration of SAR 5.72

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 6

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?

Twenty-four background soil samples were collected from 3 distinct locations (BKG01-BKG03) near the flowline and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from approximately 0 to 6 feet below ground surface and the lithology was noted to be similar to that observed in site samples.

Laboratory results indicated maximum background concentrations for pH and EC were 8.89 and 0.991 mmhos/cm, respectively. Maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and lead, were calculated to be 4.43, 143, and 16.8 mg/kg, respectively. All pH, SAR, arsenic, and barium, concentrations observed during decommissioning were below background levels. Elevated EC was detected in FL01-03@2' in exceedance of ECMC Table 915-1 regulation and maximum background. Lead was detected in exceedance of ECMC Table 915 levels and above background in sample SS01-FL01R-W@4' (wellhead flowline riser excavation).

☐ 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?

Concurrently with the remedial excavation proposed in the Remedial Action Plan sections of this Form 27, additional background sampling will be conducted (BKG04-BKG08) to determine if elevated EC and lead concentrations, observed during decommissioning, can be attributed to native soil conditions at the site. Background soil samples will be collected and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Proposed soil boring locations are shown on the attached proposed boring location map attached to this Form 27.

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 organic compound exceedances observed during decommissioning at sample locations SS03-FL01-09@2.5', FL01-01@3', FL01-03@2', FL01-05@4', FL01-06@4', FL01-08@1', and WH01@6' (11/14/24), will be removed through remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

During wellhead decommissioning, laboratory results indicated that 1,2,4-TMB, 1,3,5-TMB, naphthalene, 1-M, and 2-M, were detected in soil samples WH01@6' and FLR01@4', in exceedance of ECMC Table 915-1 regulation. A detailed summary of the wellhead decommissioning activities and a proposal for remedial excavation was submitted in Form 27 Doc# 403996197.

The benzene, toluene, ethyl-benzene, xylenes, 1,2,4-TMB, 1,3,5-TMB, naphthalene, and TPH, detected in sample locations FLR01@4', FL01R-W@4' and FL01-09@3', were removed via excavation during decommissioning. Confirmation soil samples were collected from the base (FS01-FLR-W@6' and FS01-FL01-09@5') and sidewalls of each excavation (SS01-FLR-W@2.5' to SS04-FLR-W@2.5', and SS01-FL01-09@2.5' to SS04-FL01-09@2.5') and analyzed for full ECMC Table 915-1 constituents. Base and sidewall excavation sample analytical results confirmed that organic impacts in sample locations FL01R-W@4' and FL01-09@3' had been removed, with the exception of 1,2,4-TMB and 1,3,5-TMB detected in exceedance of ECMC Table 915-1 regulation in sidewall sample location SS03-FL01-09@2.5'.

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 organic constituents 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and 1-M, detected in exceedance of ECMC Table 915-1 regulation in sample locations WH01@6', FL01-01@3', FL01-03@2', FL01-05@4', FL01-06@4', and FL01-08@1', will be removed through remedial excavation. Excavation beyond 6 feet below ground surface (bgs) will be needed to address impacts detected at sample location WH01@6' during wellhead decommissioning. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the remedial excavation, additional background samples will be collected to determine if elevated EC and lead concentrations observed during decommissioning can be attributed to native soil conditions at the site. The results of the remedial excavation and supplemental sampling will be submitted on a subsequent Form 27.

Soil Remediation Summary

☐ In Situ

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

☒ Ex Situ

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 20
Name of Licensed Disposal Facility or ECMC Facility ID # _____
Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

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

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Groundwater was not encountered during the initial site decommissioning 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 Decommissioning Sample Summary, Supplemental Source Mass Removal & Background Investigation 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

N/A

Volume of E&P Waste (solid) in cubic yards 20

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management, Ault, CO

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? No

If YES:

☐ Compliant with Rule 913.h.(1).

☐ Compliant with Rule 913.h.(2).

☐ Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

☒ 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. 11/14/2024

Proposed date of completion of Reclamation. 06/04/2027

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. 11/15/2023

Actual Spill or Release date, or date of discovery. 11/14/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/14/2024

Proposed site investigation commencement. 03/04/2025

Proposed completion of site investigation. 12/04/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/04/2025

Proposed date of completion of Remediation. 12/04/2026

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:

The implementation schedule has been changed due to the decommissioning of the Dr Joe CC 6-9 wellhead and flowline, and the necessity for remedial excavation activities and additional background sampling. The remedial excavation will be completed pending the approval of this form.

OPERATOR COMMENT

This Form 27 is being submitted to include the decommissioning results and historic reportable releases discovered at the former Dr. Joe CC 6-9 wellhead and flowline, and to propose remedial excavations to remove 1,2,4-trimethyl-benzene (TMB), 1,3,5-TMB, naphthalene, total petroleum hydrocarbons (TPH), benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and 1- methyl-naphthalene (M), detected in exceedance of ECMC Table 915-1 regulation in sample locations SS03-FL01-09, FL01-01, FL01-03, FL01-05, FL01-06, FL01-08, and WH01.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Dr Joe CC 6-9 wellhead cut and cap and flowline removal. On 11/14/25, the wellhead was cut and capped per ECMC rules. Laboratory results indicated that organic impacts were detected in soil samples WH01@6' and FLR01@4' and were reported as a historic release (Form 19 Doc# 403996715). A detailed summary of the wellhead decommissioning activities and a proposal for remedial excavation was submitted in Form 27 Doc# 403996197.

On 1/15/25 to 1/22/25, laboratory soil samples were collected during an investigation related to ~ 1149' of removed flowline. During flowline decommissioning, sample locations FL01R-W@4' and FL01-09@3' exhibited elevated PIDs and were reported as historic releases (Form 19 Doc# 403996715 and 404061560). These locations were preliminarily excavated and laboratory soil samples were collected from the base (FS01-FLR-W, FS01-FL01-09) and sidewalls (SS01-FLR-W to SS04-FLR-W, and SS01-FL01-09 to SS04-FL01-09). Excavation confirmation sample analytical results confirmed organic impacts in sample locations FLR01, FL01R-W, and FL01-09, had been removed, with the exception of 1,2,4-TMB and 1,3,5-TMB detected in exceedance of ECMC Table 915-1 regulation in sidewall sample SS03-FL01-09. Laboratory results indicated that organic constituents were detected in exceedance of ECMC Table 915-1 regulation in flowline decommissioning sample locations FL01-01, FL01-03, FL01-05, FL01-06, and FL01-08, and were reported as historic releases (Form 19 Doc#s 404065442, 404062247, 404065952, 404065994, and 404066067, respectively). Regarding the ECMC comment on these Form 19s, sample FL01-07@2' was field screened and not submitted for laboratory analysis.

Twenty-four background soil samples from depths ~ 0 to 6 ft bgs, were collected from three distinct locations (BKG01-BKG03) near the flowline and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The lithology was noted to be similar to that observed in site samples. Laboratory analytical results indicated that elevated EC (FL01-03) and lead (SS01-FL01R-W) were detected at values in exceedance of ECMC Table 915-1 regulation and background levels. Refer to Site Investigation Report section of this Form 27 for more information.

The Remedial Action Plan section of this form proposes remedial excavation to remove the organic compound exceedances observed during decommissioning at sample locations SS03-FL01-09, FL01-01, FL01-03, FL01-05, FL01-06, FL01-08, and WH01. Excavation beyond 6 feet below ground surface will be needed to address impacts detected at sample location WH01@6' during wellhead decommissioning. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the remedial excavation, additional background samples will be collected to determine if elevated EC and lead concentrations observed during decommissioning can be attributed to native soil conditions at the site. The results of the remedial excavation and supplemental sampling will be submitted on a subsequent Form 27.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The remedial excavations and background sampling investigation will be completed in accordance with the proposed implementation schedule and the results 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: Brock Nelson

Title: Environmental Consultant

Submit Date: 03/05/2025

Email: Tas-chevron-5@tasman-geo.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Chris Sanchez

Date: 04/28/2025

Remediation Project Number: 33387

COA Type

Description

	Operator shall resubmit attached analytical lab reports in the next supplemental Form filing and ensure all laboratory reports are secured and contain metadata appropriate to document any differences in created and modified dates, and/or the laboratory analytical report shall be signed with a validated signature certificate.
	Operator shall continue quarterly reporting until the site investigation is complete and Full Table 915-1 standards are met within the remediation area
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
	Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil
	Operator shall collect confirmation soil samples for Full Table 915-1 Contaminants of Concern
	Operator shall adhere to Protection of Groundwater Soil Screening Levels
5 COAs	

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>
404060780	FORM 27-SUPPLEMENTAL-SUBMITTED
404114072	SITE INVESTIGATION PLAN
404114073	ANALYTICAL RESULTS
404114074	ANALYTICAL RESULTS
404116269	SITE INVESTIGATION REPORT

Total Attach: 5 Files

General Comments

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

Total: 0 comment(s)