

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404268279

Receive Date:

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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 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>	<b>Phone Numbers</b>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>jason.davidson@chevron.com</u>	Phone: <u>(970) 939-1929</u>
		Mobile: <u>( )</u>

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 32307 Initial Form 27 Document #: 403566080

**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>WELL</u>	Facility ID: _____	API #: <u>123-25351</u>	County Name: <u>WELD</u>
Facility Name: <u>FRANK CC 7-19</u>	Latitude: <u>40.329994</u>	Longitude: <u>-104.484596</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>7</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>486257</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Frank CC #7-19</u>	Latitude: <u>40.329994</u>	Longitude: <u>-104.484596</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>7</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 CL

Most Sensitive Adjacent Land Use Cropland

Is domestic water well within 1/4 mile? No

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

Latham Ditch is 0.14mi SW 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	Refer to Tables and Figures	Lab analysis or field screening
Yes	SOILS	Refer to Tables and Figures	Lab analysis or 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 Energy & Carbon Management Commission (ECMC) Rule 911, site investigation was conducted pertaining to the FRANK CC #7-19 wellhead cut and cap and flowline abandonment. On February 22, 2024, initial wellhead characterization sampling was completed following cut and cap operations. See the Site Investigation Report (Document 403790947) submitted with Form 27 Document 403717336 for details.

On December 12, 2024, initial flowline characterization sampling was completed. See the Site Investigation Reports associated with Form 27 Document 404156349 (In Process) for details.

On February 24 and 25, 2025, delineation soil sampling was conducted at the wellhead. Five soils borings were advanced and completed as monitoring wells MW-01 through MW-05. One soil sample was collected for analysis from each soil boring and submitted for all Table 915-1 constituents. Additionally, five background soil borings were completed. See the Site Investigation Reports associated with Form 27 Document 404156349 (In Process) for details.

In March 2025, monitoring wells MW-01 through MW-05 were developed, and on March 20, 2025, first quarter 2025 groundwater monitoring was conducted. Monitoring wells were developed by surging with a dedicated bailer. Following development, the wells were allowed to recharge prior to sampling. Groundwater samples were collected from each monitoring well using disposable polyethylene bailers. Samples were field screened using visual and olfactory observations and water quality parameters including pH, dissolved oxygen, temperature, specific conductance, and oxidation reduction potential. Groundwater samples were analyzed for analysis of all Table 915-1 groundwater constituents of concern.

On June 26, 2025, Confluence returned to the location to conduct second quarter 2025 groundwater monitoring. However, the landowner denied access to the location due to active crops and requested that sampling be delayed until September 2025.

### 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 ):

Analytical results of wellhead delineation samples indicate organic constituents of concern were not present above laboratory detection levels. Elevated SAR levels were within observed background concentrations. Elevated metals were within 1.25 times background concentrations for all constituents except for lead and selenium in MW-05, which is situated within the initial wellhead characterization area. Based on this information, impacts at the wellhead have been laterally delineated for all constituents of concern and vertically delineated for all constituents, except for lead and selenium.

A flowline delineation investigation will be conducted in the vicinity of FL01-02. Additionally, as part of Chevron's data integrity review for projects associated with Eagle, all point of compliance samples will be recollected in accordance with the approved initial Form 27 investigation plan and analyzed for full Table 915-1. See the attached map for proposed sample locations.

### **Proposed Groundwater Sampling**

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

Five groundwater monitoring wells (MW-01 through MW-05) were installed at the location during the first quarter of 2025 and sampled on March 20, 2025. The monitoring wells will be sampled on a quarterly basis until all analytical results are in compliance with Table 915-1 groundwater standards for four consecutive quarters. All samples will be submitted for all organic and inorganic compounds per Table 915-1. See the attached Groundwater Monitoring Report (GWMR) for additional details.

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

## **SITE INVESTIGATION REPORT**

### **SAMPLE SUMMARY**

#### **Soil**

Number of soil samples collected     0      
Number of soil samples exceeding 915-1     0      
Was the areal and vertical extent of soil contamination delineated?           
Approximate areal extent (square feet)         

#### **NA / ND**

         Highest concentration of TPH (mg/kg)           
         Highest concentration of SAR           
BTEX > 915-1           
Vertical Extent > 915-1 (in feet)         

#### **Groundwater**

Number of groundwater samples collected     5      
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet)     6      
Number of groundwater monitoring wells installed     5      
Number of groundwater samples exceeding 915-1     5    

    ND     Highest concentration of Benzene (µg/l)           
    ND     Highest concentration of Toluene (µg/l)           
    ND     Highest concentration of Ethylbenzene (µg/l)           
    ND     Highest concentration of Xylene (µg/l)           
    ND     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?

Between February 22, 2024, and February 24, 2025, eight background soil samples were collected. The background soil samples were collected at depths between 2 and 8.5 feet below ground surface (bgs). The maximum background value for pH was observed to be 8.23. The maximum sodium adsorption ratio (SAR) value was observed to be 15.1. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, lead, and selenium were calculated to be 8.21 milligram per kilogram (mg/kg), 321 mg/kg, 0.611 mg/kg, 22.1 mg/kg, and 0.493 mg/kg, respectively. All arsenic and barium concentrations observed during the assessment sampling were below 1.25x the maximum background level. Additional samples will be collected to establish native concentrations of inorganics in groundwater.

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?

As part of Chevron's data integrity review for projects associated with Eagle, all point of compliance samples will be recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. Additional supplemental site investigation (SSI) activities will be conducted to recharacterize potential soil impacts identified by initial wellhead and flowline investigation activities. Soil samples will be collected and analyzed for all Table 915-1 constituents. The SSI results will be submitted on a subsequent Form 27.

## REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes \_\_\_\_\_

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Noble is in the process of determining the extent of impacts associated with the project. Once impacts are delineated, Noble will prepare a remediation plan to remove source material within the investigation area.

### 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.

On February 22, 2024, initial wellhead characterization sampling was completed following cut and cap operations. See the Site Investigation Report (Document 403790947) submitted with Form 27 Document 403717336 for details.

On December 12, 2024, initial flowline characterization sampling was completed. See the Site Investigation Reports associated with Form 27 Document 404156349 (In Process) for details.

On February 24 and 25, 2025, delineation soil sampling was conducted at the wellhead. Five soils borings were advanced and completed as monitoring wells MW-01 through MW-05. One soil sample was collected for analysis from each soil boring and submitted for all Table 915-1 constituents. Additionally, five background soil borings were completed. Analytical results of the delineation samples indicated organic constituents of concern in compliance with PGSSLs. Elevated levels of SAR were within observed background concentrations, and elevated metals were within 1.25 times background concentrations for all constituents except for lead and selenium in MW-05, which is situated adjacent to the point of release (POR). Based on this information, impacts at the wellhead have been laterally delineated. Vertical delineation has been achieved for all constituents, except for lead and selenium.

On March 20, 2025, first quarter groundwater monitoring was conducted on groundwater wells MW-01 through MW-05. Analytical results indicated compliance with Table 915-1 groundwater standards. See the attached GWMR for details.

On June 26, 2025, second quarter groundwater monitoring was attempted; however, the landowner denied access to the Location due to active crops. The landowner stated that access will be granted following harvest in early September 2025.

### 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.

Five groundwater monitoring wells (MW-01 through MW-05) were installed at the location during the first quarter of 2025 and sampled on March 20, 2025. Analytical results indicate compliance with Table 915-1 for all organic constituents. Chlorides and sulfates exceed standards, however, background concentrations have not been established. Site access was denied by the landowner during the second quarter of 2025 due to active crops. The monitoring wells will be sampled on a quarterly basis until all analytical results are in compliance with Table 915-1 groundwater standards for four consecutive quarters.

### 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

#### 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? \_\_\_\_\_

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 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. 02/22/2024

Proposed date of completion of Reclamation. 09/01/2026

## 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. 09/21/2023

Actual Spill or Release date, or date of discovery. 03/13/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/22/2024

Proposed site investigation commencement. 02/22/2024

Proposed completion of site investigation. 10/10/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/13/2024

Proposed date of completion of Remediation. 12/31/2025

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 FRANK CC #7-19 wellhead and flowline and necessity for supplemental site investigation activities adjacent to the wellhead and flowline. The proposed site investigation is scheduled to be completed by October 10, 2025.

### **OPERATOR COMMENT**

This form has been submitted to provide a quarterly update for the FRANK CC #7-19 (Remediation Project 32307) and to provide quarterly groundwater monitoring results.

Analytical results of the first quarter 2025 groundwater samples indicate compliance with Table 915- 1 organic constituents. The samples exhibit elevated chlorides and sulfates, however, background concentrations have not yet been established. No odor or sheen was observed in any of the samples. Second quarter samples could not be collected due to active farming activities and site access will be granted in September 2025. See the attached GWMR for details.

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

Signed: Chris McKisson

Title: Rem. Program Manager

Submit Date: \_\_\_\_\_

Email: chris.mckisson@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: 32307

### **COA Type**

### **Description**

<b><u>COA Type</u></b>	<b><u>Description</u></b>
0 COA	

### **ATTACHMENT LIST**

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

### **Att Doc Num**

### **Name**

404273955	ANALYTICAL RESULTS
404277887	SITE INVESTIGATION PLAN
404278051	MONITORING REPORT

Total Attach: 3 Files

### **General Comments**

### **User Group**

### **Comment**

### **Comment Date**

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

Total: 0 comment(s)