

State of Colorado
Energy & Carbon Management Commission

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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 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		Mobile: ()
Contact Person: Jason Davidson	Email: jason.davidson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35328 Initial Form 27 Document #: 403750480

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 #: 123-16345	County Name: WELD
Facility Name: UPRC 35-6F	Latitude: 40.270101	Longitude: -104.747390	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 35	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 488281	API #: _____	County Name: WELD
Facility Name: UPRC 35-6F	Latitude: 40.270105	Longitude: -104.747388	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 35	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? Yes

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? Yes

Other Potential Receptors within 1/4 mile

Freshwater Pond 0.1mi SW, 0.09mi SE, 0.14/0.18mi E
Freshwater Emergent Wetland 0.1/0.19/0.21mi SE, 0.14/0.16mi SW, 0.23mi W
Riverine 0.12/0.19mi S
Residential 0.16mi S
Farm Structure 0.13/0.14/0.18mi S
Apparent Pond 0.23mi 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
Yes	GROUNDWATER	Refer to Tables and Figures	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 UPRC 35-6F wellhead cut and cap. Wellhead decommissioning activities and confirmation soil sampling at the UPRC 35-6F wellhead occurred on September 17, 2024. Site investigation activities and analytical results are provided in the previously submitted Form 27 (document number 403961342). The wellhead was cut and capped per ECMC rules. Laboratory analytical results indicated a historical release occurred at the UPRC 35-6F decommissioned wellhead and was reported as a historic release in Form 19 document number 403961952. Supplemental source mass removal of hydrocarbon impacted soil by the wellhead was conducted on April 30, 2025. Following source mass removal of hydrocarbon impacted soil, confirmation soil samples were collected from the final extents of the excavation. Analytical results pertaining to the source mass removal are included in this Form 27.

Additionally, a site investigation was conducted pertaining to the UPRC 35-6F flowline involving flowline decommissioning activities and confirmation soil sampling was performed on October 29 and 30, 2024. Site investigation activities and analytical results are provided in the previously submitted Form 27 (document number 404160765). Soil samples were taken along the flowline any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway.

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):

Following source mass removal of hydrocarbon impacted soils, confirmation soil samples were collected from the final extents of the excavation. A grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were also taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory 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):

During source mass removal of hydrocarbon impacted soils on April 30, 2025, groundwater was encountered within the wellhead excavation area at a depth of 6 feet below ground surface (bgs), of which a grab groundwater sample (GW01) was 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. Additionally, a recent background sampling event performed on May 12, 2025 encountered groundwater at a depth of 6 feet bgs within two samples (BKG02-GW & BKG03-GW) that were collected and analyzed for all inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to chloride and sulfate anions by EPA Method 300.

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 areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The ECMC Wellhead Closure Checklist was utilized and filled out during the abandonment process. A detailed summary of 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 5
 Number of soil samples exceeding 915-1 0
 Was the areal and vertical extent of soil contamination delineated? Yes
 Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____
 -- Highest concentration of SAR 3.76
 BTEX > 915-1 No
 Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 1
 Was extent of groundwater contaminated delineated? Yes
 Depth to groundwater (below ground surface, in feet) 6
 Number of groundwater monitoring wells installed 0
 Number of groundwater samples exceeding 915-1 0

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) _____
 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?

Four background soil samples were collected from two locations near the wellhead on April 30, 2025 and an additional three background soil and groundwater samples were collected from three locations near the flowline on May 12, 2025 and analyzed for Table 915-1 metals in soil and Soil Suitability for Reclamation parameters per ECMC Table 915-1. The background soil samples were collected from depths of 4 and 8 feet below ground surface (ft bgs) and the background groundwater samples were collected from a depth of 6 feet bgs. The lithology between the site and background locations was observed to be well graded sands.

The maximum background concentration for pH was 8.38. The maximum background soil concentrations with a 1.25x multiplier applied for arsenic was calculated to be 1.6313 mg/kg at 4 ft bgs. All other concentrations were below ECMC Table 915-1 Limits. Additional background soil and groundwater samples will be collected to determine site specific background concentrations.

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?

One of the groundwater background samples (BKG01-GW) collected on May 12, 2025 could not be sampled due to collapsing sands. A supplemental site investigation (SSI) will be completed to collect an additional background water sample(s), and additional background samples around the flowline for elevated pH. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27. A proposed SSI map is 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.

On April 30, 2025, 50 cubic yards of impacted material at the wellhead was removed and hauled to a permitted disposal facility, North Weld Landfill. Confirmation samples collected after excavation were analyzed for the full Table 915-1 suite, and results indicated all organic impacts have been removed. Refer to the Remediation Summary and Operator Comment sections for additional work planned to address remaining inorganic impacts.

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.

One of the groundwater background samples (BKG01-GW) collected on May 12, 2025 could not be sampled due to collapsing sands. A supplemental site investigation (SSI) will be completed to collect an additional background water sample(s), and additional background samples around the flowline for elevated pH. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27. A proposed SSI map is attached to this Form 27.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 50

_____ 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 encountered and sampled during site investigation activities. One groundwater sample (GW01' at 6' bgs) was collected near the former wellhead location on April 30, 2025, and was submitted for laboratory analysis of (BTEX, TMBs, chloride, etc.). Analytical results indicated organic compounds were undetected, and the initial investigation of background inorganics in groundwater was completed on May 12, 2025; however, during site investigation activities, one of the background groundwater samples (BKG01-GW) was not sampled due to collapsing sands. As such, an investigation of background inorganics in groundwater will be completed again via the proposed background sample locations.

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 and Site investigation Proposals _____

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:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards _____ 50

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: North Weld Landfill

Volume of E&P Waste (liquid) in barrels _____ 0

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? 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 reseeded 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. 09/17/2024

Proposed date of completion of Reclamation. 10/31/2026

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. 10/17/2024

Actual Spill or Release date, or date of discovery. 10/17/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/17/2024

Proposed site investigation commencement. 09/02/2025

Proposed completion of site investigation. 01/02/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/02/2025

Proposed date of completion of Remediation. 01/02/2026

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 UPRC 35-6F wellhead and flowline and necessity for supplemental site investigation activities adjacent to the wellhead and flowline. The proposed site investigation will be completed following the approval of this form.

OPERATOR COMMENT

This Form 27 is being submitted to include a 3Q 2025 update for the UPRC 35-6F wellhead and flowline (REM #35328) and the decommissioning results and historic reportable release discovered on September 17, 2024 at the former UPRC 35-6F wellhead location. A supplemental site investigation (SSI) will be completed to collect additional background groundwater sample(s) to determine if elevated levels of Total Dissolved Solids, Chloride, and Sulfate are attributed to local groundwater conditions. Additional soil background samples will be collected to determine native concentrations of pH. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

On April 30, 2025, source mass removal was conducted and 50 cubic yards of impacted material at the wellhead was removed and hauled to a permitted disposal facility. Confirmation samples collected after excavation were analyzed for the full Table 915-1 suite, and results indicated all organic impacts have been removed.

Four background soil samples were collected from two locations near the wellhead and one groundwater sample was collected from the base of the wellhead on April 30, 2025 and an additional three background soil and groundwater samples were collected from three locations near the flowline on May 12, 2025. Soils were analyzed for Table 915-1 metals in soil and Soil Suitability for Reclamation parameters per ECMC Table 915-1 and the wellhead base groundwater sample was analyzed for Table 915-1 Organics and dissolved metals, with the background groundwater samples analyzed for only Table 915-1 dissolved metals. The background soil samples were collected from depths of 4 and 8 feet below ground surface (ft bgs) and the groundwater samples were collected from a depth of 6 feet bgs. The lithology between the site and background locations was observed to be well graded sands.

Pursuant to Rule 913.e, quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation 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: Kayla White, P.E. _____

Title: Environmental Consultant _____

Submit Date: _____

Email: kwhite@cdhconsult.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: 35328

COA Type	Description
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
404266262	LABORATORY ANALYTICAL REPORT
404266263	LABORATORY ANALYTICAL REPORT
404267773	SITE INVESTIGATION REPORT

Total Attach: 3 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)