

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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Report taken by:
Kyle Waggoner

Site Investigation and Remediation Workplan (Initial 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: (303) 829-2393
City: DENVER State: CO Zip: 80202		Mobile: ()
Contact Person: Randy Thweatt	Email: BWGroup@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 42321 Initial Form 27 Document #: 404230290

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

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 490603	API #: _____	County Name: WELD
Facility Name: Parcel T137-1 490603	Latitude: 40.508442	Longitude: -104.612461	
	** correct Lat/Long if needed: Latitude: 40.508100	Longitude: -104.612809	
QtrQtr: SESW	Sec: 1	Twp: 6N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use agricultural, residential, livestock
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

These points are related to the specified Lat/Longs of this specific form and DO NOT reflect the distances from the unintentional release point.

Mule Deer Severe Winter Range High Priority Habitat located on the parcel

Unidentified pond ~ 1220'N

Freshwater pond ~1150'NE

Sanborn Draw (Riverine) ~ 1235'E

Riverine ~ 870'E

Riparian Forested Shrub ~ 840'E

Freshwater Emergent Wetland ~ 1285'NE

Residential Structures ~ 115'SW, 605'NE, 440/570/535/780'SE, 1035'W

Farm Structure ~ 65'SW, 90'NE, 40/535/810/845'SE, 398/518/575/660/712/855'NE, 598'E, 1075/1140'NW, 960'W

Agricultural crop field ~ 130'N, 265'S

Livestock corrals ~ 178/722/516/546'NE, 570'SE, 1080'NW, 21 corrals ~ 960'W, 1075/1155/1040'NW, 915/1080/1060'W, 4 corrals ~ 946'W

Unnamed Private Road ~ 1000'SE

Weld County Road 72 ~ 225'S

Domestic water well: Permit #146340 (receipt #0269028 located ~ 386'SE); Permit #231594 (receipt #0470659 located ~508'SE); Permit #261559 (receipt #0534114 located ~ 584'SE);

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input checked="" type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input checked="" type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Undetermined	Visual/Olfactory; Laboratory Analysis
UNDETERMINED	VEGETATION	Undetermined	Visual/Olfactory

INITIAL ACTION SUMMARY

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

On Sunday, April 6, at approximately 6 pm, Noble incurred a well control incident near Galeton in Weld County at the Bishop Well. Noble notified the Galeton Fire Department and immediately activated emergency response procedures, mobilized an extensive cross-functional team of subject matter experts, and worked closely with the Galeton community and Fire Department. The Bishop Well was secured on 4/10/2025. Unified Command (UC) stood up on 4/7/2025 to undertake initial actions and emergency response measures. On 4/14/2025, UC stood down and Noble's Incident Command (IC) took over, continuing emergency response measures in coordination with UC agencies. The investigation into the incident is ongoing and response activities continue to abate and remediate impacts associated with E&P waste.

This Form 27 addresses impacts within Parcel T137-1 with an approximate area of 1.11 acres, more specifically depicted on the attached Site Overview Map ("Incorporated Lands"). Separate Form 27s will be submitted to address abatement, investigation, and remediation activities associated with other land parcels potentially impacted by the Bishop Well incident.

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 sampling is underway consistent with the attached Environmental Sampling Analysis Plan (ESAP) v1.6, and Residential Soil Sampling Locations Plan (RSSLP) v1.3. To date, 19 soil samples have been collected. Final validated laboratory data are attached for the preliminary sample, but laboratory analytical results for the comprehensive soil samples are pending.

Proposed Groundwater Sampling

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

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):

If confirmation soil samples indicate additional remedial actions are necessary, the proposed additional investigation sampling plan will be updated on a supplemental F27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 19
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 0.506
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
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?

The extent of potential impacts to adjacent properties will be individually assessed with separate Remediation Project Numbers according to their assigned parcel ID.

Were background samples collected as part of this site investigation?

Background samples have been collected, and final analytical results are pending lab validation.

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?

Noble is conducting an initial site investigation to identify additional potential remedial activities. Should final analytical data indicate the agreed upon list of constituents sampled for analyses exceed applicable limits, a proposed remedial action plan will be developed and submitted for approval.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If E&P waste(s) is encountered it will be collected, removed, and disposed within the limits of the Incorporated Lands in accordance with applicable requirements.

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.

Noble is implementing a multi-phase approach to determine the extent of potential impacts to soil, surface water, and/or groundwater, which will be used to generate a fit-for-purpose remedial action plan. Both visual and olfactory observations and initial PID readings are being relied upon to qualitatively screen for potential soil, surface water, and/or groundwater impacts. Samples are being collected for laboratory analysis to determine whether any analyzed constituent exceeds an applicable threshold or limit. Such identified exceedances will be incorporated into the evaluation of proposed remediation approaches (e.g., in situ, ex situ, monitoring), which will be submitted for review and approval.

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

_____ Natural Attenuation

_____ Other _____

_____ 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.

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 Supplemental Site investigation for soil and air.

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 remaining costs for this project to be determined with the development of work plans necessary to meet ECMC regulations.

Operator anticipates the remaining cost for this project to be: \$ _____

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: _____

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.

The Incorporated Lands are not associated with Oil & Gas Operations. Nonetheless, reclamation activities will be completed once a remedial no further action approval is obtained in accordance with 1000 Series Rules.

Is the described reclamation complete? _____

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. _____

Proposed date of completion of Reclamation. _____

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. 04/06/2025

Actual Spill or Release date, or date of discovery. 04/06/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/14/2025

Proposed site investigation commencement. 05/14/2025

Proposed completion of site investigation. 08/14/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/14/2025

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:

Completion dates subject to change based upon data received as part of the site investigation and implementation of appropriate remedial activities. Initiation of the site investigation and interim remediation activities as part of response activities commenced on 05/14/2025. Remedial actions will be initiated consistent with ECMC approval of Form 27.

OPERATOR COMMENT

As noted above, this Form 27 is limited to the site investigation and associated remediation activities within Incorporated Lands.

Separate Form 27s will be submitted to address other parcels with potential impacts from the Bishop Well incident.

To support remedial activities, operator is submitting separate Form 27s to address potential impacts associated with agricultural and residential lands and parcels have been subdivided to represent agricultural or residential lands. As such, the previous lat/long coordinates provided were the center of the parcel as defined by the county property boundaries but may not represent the center of the subdivided agricultural and residential lands.

Estimated volumes, dates, and investigation/remediation approaches are subject to revision based on the receipt of additional data being generated as part of ongoing response efforts, including site investigation tasks.

Background samples have been collected, and final analytical results are pending lab validation.

Samples collected to date with validated analytical results are attached to this Form 27. Analytical data and summary tables not contained in this Form 27 are pending data validation and will be provided to ECMC within a supplemental Form 27.

Rapid Assessment Team (RAT) observations and findings associated with the Incorporated Lands are attached.

Background samples have been collected and final analytical results are pending lab validation.

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

Signed: Randy Thweatt

Title: Regulatory Compliance Mgr

Submit Date: 07/21/2025

Email: randythweatt@chevron.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: Kyle Waggoner

Date: 08/28/2025

Remediation Project Number: 42321

COA Type

Description

	Operator shall provide complete laboratory analytical tables for the full Table 915-1 analyte list, regardless of detection status. Summary statements such as "all results were non-detect below the reporting limit" are not acceptable without a detailed table.
	Operator did not analyze total uranium in soil as proposed in the original approved ESAP dated 4/17/2025, and apparently removed uranium from the soil sampling plan without explanation. Operator shall justify removal of uranium from the total metals list or provide total uranium analytical results.
	On future Supplemental Form 27s, verify whether surface water sampling is proposed for this T-parcel.
	Quarterly reporting is approved for this project. Next Supplemental Form 27 is expected 09/21/2025.
	On future Supplemental Form 27s, indicate date(s) of work completed for any remediation work or soil or water sampling where results are pending at the time of the Supplemental Form 27 submittal. Provide a schedule for submitting those pending results.
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.

Att Doc Num

Name

404230290	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
404286870	ANALYTICAL DATA SUMMARY TABLE(S)
404286872	ANALYTICAL DATA SUMMARY TABLE(S)
404286874	ANALYTICAL DATA SUMMARY TABLE(S)
404286881	ANALYTICAL DATA SUMMARY TABLE(S)
404286883	SOIL SAMPLE LOCATION MAP
404286886	LABORATORY ANALYTICAL REPORT

404286887	LABORATORY ANALYTICAL REPORT
404286888	LABORATORY ANALYTICAL REPORT
404286891	LABORATORY ANALYTICAL REPORT
404287257	LABORATORY ANALYTICAL REPORT
404287259	LABORATORY ANALYTICAL REPORT
404287649	OTHER
404287652	OTHER
404287655	OTHER
404287658	SITE MAP
404335538	FORM 27-INITIAL-SUBMITTED

Total Attach: 17 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC notes the results for hexavalent chromium are rendered invalid due to holding time exceedance after sample preparation.	08/25/2025
Environmental	ECMC notes the following analytes exceeded either the Table 915-1 or EPA RSL for Resident Soil: arsenic, Barium and Selenium. Operator has indicated that background soil samples have been collected and laboratory report data validation is pending.	08/25/2025
Environmental	Operator will revise summary analytical tables as discussed including: 1. Add EPA RSLs for Resident Soil, 2. Provide an additional separate analytical summary table for soil suitability parameters (pH, EC, SAR, hot water soluble boron). 3. For non-detect results in summary tables include the laboratory reporting limit; for example "<0.005" or "ND < 0.005", but do not use "NA" or "ND".	08/25/2025
Environmental	ECMC removed "Land Treatment Progress Report" as a Report Type. Land Treatment is defined in ECMC Rules and not approved for this project. On future reports, Operator will indicate the site specific nature of this report: e.g. "Soil Sample Results Report"	08/25/2025
Environmental	ECMC acknowledges receipt of the laboratory analytical results for the soil sample collected on this project and additional results are pending data validation.	07/15/2025

Total: 5 comment(s)