

State of Colorado  
Energy & Carbon Management Commission

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



Document Number:  
404329600

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: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers Phone: (832) 349-0757 Mobile: ( )
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO	Zip: 80202
Contact Person: Lauren Hoff	Email: lauren.hoff@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25040 Initial Form 27 Document #: 403160963

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: WELL	Facility ID: _____	API #: 123-13197	County Name: WELD
Facility Name: WPF III A18-13A	Latitude: 40.480489	Longitude: -104.599693	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSW	Sec: 18	Twps: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland

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**

Colorado Division of Water Resources (DWR) well permit number 231595 0.19mi SW  
Well within Mule Deer Severe Winter Range HPH  
Freshwater Emergent Wetland 0.21mi E, 0.18mi NE  
Riverine 0.15mi NE, 0.20mi E  
Farm Structures 0.15mi NW, 0.13mi N, 0.12mi E, 0.22mi SE, 0.17mi SW  
Residential Structures 0.13mi N, 0.18mi NW, 0.14/0.17mi SW, 0.09/0.22mi SE

**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 and 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 Colorado Energy & Carbon Management Commission (ECMC) Rule 911, site investigation activities were conducted pertaining to the WPF III #A18-13A wellhead cut and cap and flowline removal. On October 19, 2022, initial wellhead characterization sampling was completed by Eagle Environmental Consulting, LLC (Eagle) during cut and cap operations. See the Site Investigation Report associated with Form 27 Document 403833160 for details.

On January 10, 2023, initial flowline characterization was completed by Fremont Environmental, Inc. (Fremont) during the removal of approximately 453 feet of flowline. The sample collected at the separator is being addressed under Remediation Project 25398 per Form 27 Document 403697659. See the Site Investigation Report associated with Form 27 Document 403697659 for details.

On November 26, 2024, a supplemental site investigation (SSI) was completed by Eagle to delineate potential impacts at the wellhead. Five soil borings were advanced adjacent to and surrounding the wellhead and samples were collected at 6-7 feet and 7-8 feet below ground surface (bgs). Additionally, three background soil borings were advanced. See the Site Investigation Report associated with Form 27 Document 404123503 for details.

On June 24, 2025, Confluence Compliance Companies, LLC (Confluence) conducted a site investigation to recharacterize the samples collected by Eagle during the initial and supplemental wellhead assessments. Five soil borings were advanced and samples were collected at 6 and 9 feet bgs from each boring and submitted for analysis of full Table 915-1 constituents. Additionally, six background soil borings were advanced in native, nearby, non-disturbed areas to characterize native concentrations of inorganics at the Location. One sample was collected from each soil boring: three at 6 feet bgs, and three at 9 feet bgs. See the attached Report of Work Completed (ROWC) for details.

**PROPOSED SAMPLING PLAN**

**Proposed Soil Sampling**

Will soil samples be collected as part of this investigation? ( Number, type (grab/composite), analyses, and locations of samples ):

Additional soil samples will be collected to confirm potential soil impacts identified by investigation activities. Soil samples will be submitted for analysis of all Table 915-1 soil constituents of concern. Background samples will be collected to further characterize native levels of inorganic constituents at the Location. See the attached ROWC for details.

**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 Table 915-1.

**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 investigation 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 10

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 200

### NA / ND

-- Highest concentration of TPH (mg/kg) 25.8

-- Highest concentration of SAR 16.7

BTEX > 915-1 No

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?

On June 24, 2025, six background soil samples were collected at depths of 6 and 9 ft bgs and analyzed for all Table 915-1 inorganic constituents. Analytical results of background soil samples indicate native levels of electrical conductivity (EC), sodium adsorption ratio (SAR), boron, arsenic, barium, hexavalent chromium, and selenium exceeding SSR and Protection of Groundwater Soil Screening Limits (PGSSL) standards. The maximum background values for EC, SAR, and boron are 8.50 mmhos/cm, 14.6, and 2.23 mg/kg, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, hexavalent chromium, and selenium are 8.69 mg/kg, 1,105 mg/kg, 0.21 mg/kg, respectively.

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 have been recollected in accordance with the approved Form 27 investigation plan. SSI activities will also be conducted to characterize potential inorganics impacts identified at the wellhead. All soil samples will be analyzed for full Table 915-1 constituents. Additional background samples will be collected and analyzed for all Table 915-1 inorganics to further characterize native levels of SAR, arsenic, and selenium. 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? No

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

No impacted material caused by oil and gas operations has been identified at this time.

### 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 October 19, 2022, initial wellhead characterization sampling was completed by Eagle during cut and cap operations. Analytical results of the wellhead characterization sample indicated compliance with Table 915-1 PGSSL and SSR standards for all constituents except for EC, at a level of 4.20 millimhos per centimeter (mmhos/cm). See the Site Investigation Report associated with Form 27 Document 403833160 for details.

On January 10, 2023, initial flowline characterization was completed by Fremont. Analytical results of the sample collected at the wellhead indicated compliance with all PGSSL and SSR standards. See the Site Investigation Report associated with Form 27 Document 403697659 for details.

On November 26, 2024, an SSI was completed by Eagle to delineate potential impacts at the wellhead. Five soil borings were advanced adjacent to and surrounding the wellhead and samples were collected at 6-7 feet and 7-8 feet below ground surface (bgs). Analytical results indicated several exceedances of the applicable standards for inorganic constituents. See the Site Investigation Report associated with Form 27 Document 404123503 for details.

On June 24, 2025, Confluence conducted a site investigation to recharacterize samples collected by Eagle. Five soil borings were advanced and samples were collected at 6 and 9 feet bgs from each boring and submitted for analysis of full Table 915-1 constituents. Additionally, six background soil borings were advanced in native, nearby, non-disturbed areas to characterize native concentrations of inorganics at the Location. Analytical results of recharacterization samples indicated compliance with PGSSLs for all organic constituents. Exceedances of several inorganic constituents were detected in the characterization and background soil samples. All constituents are within the site specific background limits except for SAR, arsenic, and selenium. See the attached Report of Work Completed (ROWC) for details.

### **Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

### **GROUNDWATER MONITORING**

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

Groundwater was not encountered during the site investigation.

# 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, SSIP, and SSIR

## 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 in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes \_\_\_\_\_

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

Interim  Final

Did the Surface Owner provide the seed mix? \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

### **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 10/19/2022

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. 07/21/2022

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 10/19/2022

Proposed site investigation commencement. 09/16/2022

Proposed completion of site investigation. 01/30/2026

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 01/30/2026

Proposed date of completion of Remediation. 03/31/2026

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 WPF III #A18-13A wellhead and flowline and necessity for additional SSI activities adjacent to the wellhead.

**OPERATOR COMMENT**

This form has been submitted to provide a third quarter 2025 update for the WPF III #A18-13A (Remediation Project 25040), to submit a supplemental site investigation plan (SSIP), and to report the results of recent investigation.

As part of Chevron's data integrity review for projects associated with Eagle, all point of compliance samples have been recollected in accordance with the approved Form 27 investigation plan. On June 24, 2025, Confluence conducted a site investigation to recharacterize the samples collected by Eagle during initial and supplemental wellhead assessments as well as background sampling. Analytical results of recharacterization samples indicated compliance with PGSSLs for all organic constituents. Several inorganic constituents were in exceedance of PGSSL and SSR standards, however, when site specific background limits are considered, all constituents are in compliance except for SAR, arsenic, and selenium.

Site-specific background data collected from the Location indicates that levels of EC, SAR, boron, arsenic, barium, hexavalent chromium, and selenium above PGSSLs are present in native soil. Based on shared soil classification and observed characteristics, proximity of collection areas, and similar laboratory results when compared to background, it is reasonable to conclude that inorganic constituent concentrations within the investigation area are consistent with the naturally occurring range of values for this area. The operator requests approval of alternative limits (1.25x background levels) for arsenic (8.69 mg/kg), barium (1,105 mg/kg), hexavalent chromium (0.21 mg/kg), and selenium (0.528 mg/kg), in accordance with Table 915-1 Footnote 11. Additionally, the operator requests approval of alternative limits for EC (8.50 mmhos/cm), SAR (14.6), and boron (2.23 mg/L) in accordance with Table 915-1 Footnote 1.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. Confluence plans to conduct the proposed SSI in accordance with the proposed implementation schedule and the SSIP attached to this form submittal. The results will be submitted in 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: Holly Tignac

Title: Project Scientist

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

Email: holly.tignac@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: 25040

**COA Type**

**Description**

0 COA	
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**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**

404331254	LABORATORY ANALYTICAL REPORT
404337638	SITE INVESTIGATION REPORT

Total Attach: 2 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)