

State of Colorado  
Energy & Carbon Management Commission

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404263270  
Receive Date:  
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Report taken by:  
Kyle Waggoner

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 ECOM 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	<b>Phone Numbers</b>
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 #: 40883 Initial Form 27 Document #: 404187063

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: 490064	API #: _____	County Name: WELD
Facility Name: Parcel T065	Latitude: 40.505798	Longitude: -104.588037	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 7	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Residential, agricultural, livestock  
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? 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.

- Freshwater Emergency Wetland ~500' W
- Bishop well pad, site of unintentional release, ~850' E
- Mule Deer Severe Winter Range High Priority Habitat located within the area of the unintentional release
- Unidentified Ponds ~470' SW, ~730' SW, 892' NW
- Residential Structures located respectively ~675' NE, ~1000' NW, ~1320' SE, 1320' NE
- Riverine (Willow Creek) adjacent on site to the west
- Agricultural crop field located ~680' W, ~1300' NW, ~925' NE, ~450' SE
- Located within Agricultural crop field

**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	UNDETERMINED	Visual/olfactory; Laboratory Analysis
Yes	SOILS	UNDETERMINED	Visual/olfactory; Laboratory Analysis
UNDETERMINED	SURFACE WATER	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 T065 with an approximate area of 19.09 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. In certain instances, separate Form 27s were submitted to differentiate the residential areas within a single parcel. The Form 27 addressing the residential area associated with parcel T065 is designated T065-1 with a Facility ID of 490309 (Document #404197941).

**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. Operator previously reported that as of 05/29/2025, 22 soil samples were collected and final laboratory analytical results were pending (Document #404187063). The collections consisted of samples from both the Incorporated Lands and parcel T065-1. Operator is clarifying that 23 samples have now been collected, 4 are associated with the Incorporated Lands; the remainder are associated with T065-1. Final validated laboratory data was received on 07/14/2025 for 3 of the 4 samples and are attached. Final laboratory data are pending on the remaining soil sample associated with the Incorporated Lands. The sample summary section is updated to reflect the revised sample number.

**Proposed Groundwater Sampling**

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

Groundwater sampling is underway consistent with the attached Groundwater Monitoring Well Sampling and Analysis Plan GMWSAP) v1.2. If groundwater is determined to be impacted, monitoring wells will be installed to delineate the extent of impacts consistent with the GMWSAP. Potential exceedances will be incorporated into the evaluation of proposed remediation approaches and will be submitted for review and approval. To date, 51 groundwater samples have been collected, but final laboratory analytical results are pending.

### Proposed Surface Water Sampling

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

Surface water sampling will be conducted in accordance with the attached ESAP v1.6 if/when seasonal conditions allow and/or as directed by ECMC.

### 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 4

Number of soil samples exceeding 915-1 3

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

Approximate areal extent (square feet) 0

#### NA / ND

-- Highest concentration of TPH (mg/kg) 181.4

-- Highest concentration of SAR 3.36

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) 3

Volume of liquid waste (barrels) 2

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

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.

E&P waste(s) are being 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 )

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

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

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 18

\_\_\_\_\_ 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 samples were collected and analyzed for parameters specified within the GMWSAP. If groundwater is determined to be impacted, monitoring wells will be installed to delineate the extent of impacts consistent with the GMWSAP. Potential exceedances will be incorporated into the evaluation of proposed remediation approaches and will be submitted for review and approval.

# 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, air, and surface water. \_\_\_\_\_

## 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? 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 \_\_\_\_\_ 18

E&P waste (solid) description    Soil, mulch, gravel / Impacted Debris (veg), Household items, Exterior Impacted Debris (trees)

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility:    Waste Management – North Weld Landfill – 40000 CR 25 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.

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). 04/27/2025

Proposed site investigation commencement. 04/27/2025

Proposed completion of site investigation. 06/27/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/27/2025

Proposed date of completion of Remediation. 06/30/2026

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:

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 is tentatively scheduled for 4/27/2025. 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.

Parcel boundary and its acreage has been refined and is reflected in this form and its attachments.

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

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

Operator previously reported that as of 05/29/2025, 22 soil samples were collected and final laboratory analytical results were pending (Document #404187063). The collections consisted of samples from both the Incorporated Lands and parcel T065-1. Operator is clarifying that to date 23 samples have been collected, 4 are associated with the Incorporated Lands; the remainder are associated with T065-1.

Final validated laboratory data was received on 07/14/2025 for 3 of the 4 samples and are attached. Final laboratory data are pending on the remaining soil sample associated with the Incorporated Lands. The sample summary section is updated to reflect the revised sample number. Of the Incorporated Lands samples, 3 parent samples were analyzed and 2 were collected for quality assurance activities. ESAP analyte exceedances were reported for 3 samples.

The waste volumes provided in the Soil Remediation Summary and Waste Disposal sections of this F27 have been automatically rounded to whole numbers. Total E&P waste is comprised of approximately 6.89 cubic yards of impacted vegetation, 1.77 cubic yards of household debris, and 9.81 cubic yards of impacted soil.

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: 07/24/2025

Email: randythweatt@chevron.com

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

ECMC Approved: Kyle Waggoner

Date: 09/16/2025

Remediation Project Number: 40883

### 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.
	Quarterly reporting is approved for this project.
	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.
	ECMC notes the results for hexavalent chromium are rendered invalid due to holding time exceedance after sample preparation.
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

404263270	FORM 27-SUPPLEMENTAL-SUBMITTED
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404264132	OTHER
404264150	OTHER
404264163	SOIL SAMPLE LOCATION MAP
404264206	OTHER
404264209	OTHER
404274476	SITE MAP
404277927	LABORATORY ANALYTICAL REPORT
404277928	LABORATORY ANALYTICAL REPORT
404277930	LABORATORY ANALYTICAL REPORT
404277931	LABORATORY ANALYTICAL REPORT
404277934	LABORATORY ANALYTICAL REPORT
404277936	LABORATORY ANALYTICAL REPORT
404277938	ANALYTICAL DATA SUMMARY TABLE(S)
404277940	ANALYTICAL DATA SUMMARY TABLE(S)
404278300	ANALYTICAL DATA SUMMARY TABLE(S)
404278302	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 17 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC notes the following analytes out of cleanup level range for Table 915-1 Soil Suitability for Reclamation: boron.	09/16/2025
Environmental	ECMC notes the following analytes exceeded either the Table 915-1 or EPA RSL for Resident Soil: arsenic, Barium, Cadmium, Lead, and Selenium. Operator has indicated that background soil samples have been collected and laboratory report data validation is pending.	09/16/2025
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".	09/16/2025
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"	09/16/2025
Environmental	ECMC acknowledges receipt of the laboratory analytical results for the soil sample collected on this project and additional results are pending data validation.	09/16/2025

Total: 5 comment(s)