

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404445091

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 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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	<b>Phone Numbers</b>
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(832) 943-0805</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>( )</u>
Contact Person: <u>Paul Bireta</u>	Email: <u>BWGroup@chevron.com</u>	

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 42253 Initial Form 27 Document #: 404184444

**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: <u>SPILL OR RELEASE</u>	Facility ID: <u>490024</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Willow Creek T900 490024</u>	Latitude: <u>40.504108</u>	Longitude: <u>-104.589134</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>7</u>	Twps: <u>6N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

**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.

In Riverine habitat

Freshwater Emergent Wetland ~1100' NW, ~1800' S

Riverine 0.06mi N, 0.08mi NW, 0.14/.25mi S, 0.18mi SW, 0.11/0.12mi W

Riparian Forested Shrub ~1584' S

Bishop well pad, site of unintentional release, ~1300' NE

Mule Deer Severe Winter Range High Priority Habitat located within the area of the unintentional release

Unidentified Ponds ~2112' W, ~475' N

2 Residential Structures located respectively ~1320' NE, and ~1300' E

Agricultural crop field located ~300' NE, ~800' NW

**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	Undetermined	Visual/olfactory; Laboratory analysis
UNDETERMINED	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 located within the Willow Creek area near Lat/Long 40.504108 / -104.589134. The site assessment, investigation and remedial actions for the Willow Creek were initiated on visually impacted areas, but excavation limits determined by both initial pre-excavation and post-excavation confirmation soil samples. Investigation and remedial actions have begun. Pre-excavation soil samples were collected to identify approx. limits of planned excavation to depths from 1-3 feet below ground surface, occurring 4/11/25 to 4/21/25. Confirmation samples collected were consistent with the attached Environmental Sampling Analysis Plan (ESAP). This sampling plan overlaps the area discussed in the Greeley Canal #2 (Doc 4041893086) Form 27 Initial - that comingled area will be excluded by the sampling plan herein, in order to eliminate duplicate work and submissions.

**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 ESAP v2.0, and Residential Soil Sampling Locations Plan (RSSLP) 1.3. To date, 103 soil samples have been collected but laboratory analytical results are pending.

**Proposed Groundwater Sampling**

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

Monitor well installation is currently occurring outside the Willow Creek boundaries. If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed consistent with the attached Groundwater Monitoring Well Sampling and Analysis Plan.

**Proposed Surface Water Sampling**

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

Surface water sampling is underway consistent with the ESAP v2.0 To date, 2093 surface water samples have been collected but laboratory analytical results are pending lab validation.

**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 103

Number of soil samples exceeding 915-1 6

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) 0.642

-- Highest concentration of SAR 19.8

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

2093 Number of surface water samples collected

0 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

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.

### REMEDICATION 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) \_\_\_\_\_ 1

\_\_\_\_\_ 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 monitoring well installation is underway outside the Willow Creek boundaries. Additional groundwater monitoring wells will be installed if groundwater is encountered during the investigative and remedial efforts, as needed. Sampling will be conducted consistent with the attached Groundwater Monitoring Well Sampling and Analysis Plan.

# 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, surface water and groundwater impacts \_\_\_\_\_

## 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 \_\_\_\_\_ 1

E&P waste (solid) description Soil/Gravel/Mulch

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

Non-ECMC Disposal Facility: Pawnee Waste LLC - 47368 CR 118, Grover CO 80729

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 28963

E&P waste (liquid) description Recoverable Liquids\*

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

Non-ECMC Disposal Facility: Pawnee Waste LLC / NGL Water Solutions DJ, LLC

## 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). 04/06/2025

Proposed site investigation commencement. 04/06/2025

Proposed completion of site investigation. 07/06/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/19/2025

Proposed date of completion of Remediation. 04/06/2030

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 4/6/2025. Remedial actions will be initiated consistent with ECMC approval of Form 27.

**OPERATOR COMMENT**

Noble requests to modify the frequency and location of water samples on Willow Creek while the Sampling Reduction Plan, submitted to ECMC on 11/12/25 (Document #404335378), is under review. Currently, Willow Creek and Lone Tree Creek are sampled daily. This proposed adjustment aims to decrease the sample frequency in Willow Creek (locations W002.5, W004.5, W004, and W005) to one day per week, and the day following any rain event greater than 1-inch within a 24-hour period. Additionally, operator proposes to discontinue sampling at Lone Tree Creek (locations W001, W002, W003, and W006). Adequate data has been received and evaluated, and interim remedial actions such as source area soil excavation have been taken to reduce the likelihood of potential contamination to surface water. Therefore, sampling at the Willow Creek locations and at this frequency will continue to provide data to monitor any changes in the water quality.

Once approved, this Willow Creek sampling adjustment will be initiated beginning December 2, 2025.

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.

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.

\*Recovered liquids are not the same as spill volumes.

Analytical data and summary tables are pending data validation and will be provided to ECMC within a supplemental Form 27.

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 0.17 cubic yards of impacted vegetation and 28,963 bbls of E&P liquids.

In the Periodic Reporting section of the plan, Operator removed "Land Treatment Progress Report" as a Report Type.

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: Paul Bireta

Title: Project Manager

Submit Date:

Email: pbireta@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:

Date:

Remediation Project Number: 42253

**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**

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Total Attach: 0 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)