FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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Receive Date:
Report taken by:

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.
This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECMC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27.
This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.
Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATON

Name of Operator: NOBLE ENERGY INC Operator No: 100322
Address: 1099 18TH STREET SUITE 1500
City: DENVER State: CO Zip: 80202
Contact Person: Erica Zuniga Email: Rbueuf27@chevron.com

Phone Numbers
Phone: (970) 304-5000
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34834 Initial Form 27 Document #: 403722267

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.
- [X] 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.
- [X] Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- [ ] Rule 913.g: Changes of Operator.
- [ ] Rule 915.b: Request to leave elevated inorganics in situ.
- [ ] Other:

SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL Facility ID: API #: 123-14912 County Name: WELD
Facility Name: MCMILLEN TRUST 19-14G Latitude: 40.293010 Longitude: -104.708400
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESW Sec: 19 Twp: 4N Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 488975 API #: County Name: WELD
Facility Name: McMillen Trust 19-14G Latitude: 40.293020 Longitude: -104.708444
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESW Sec: 19 Twp: 4N Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 489982 API #: County Name: WELD

Facility Name: McMillen Trust 19-14G Latitude: 40.294092 Longitude: -104.710697

** correct Lat/Long if needed: Latitude: Longitude:

QtrQtr: SWSW Sec: 19 Twp: 4N Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Cropland

Is domestic water well within 1/4 mile? Yes

Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Riverine 0.11mi NW
Freshwater Emergent Wetland 0.13mi NW
Residential 0.18mi S
Farm Structure 0.2/0.23mi S

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA)
- [ ] **Non-E&P Waste**

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	Refer to ECMC Document #404178102	Lab analysis and field screening
Yes	SOILS	Refer to ECMC Document #404178102	Lab analysis and field screening

INITIAL ACTION SUMMARY

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

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the MCMILLEN TRUST 19-14G wellhead cut and cap and flowline removal. Approximately 823' of flowline was removed, however approximately 437' of the flowline was abandoned-in-place due to common trenching with another flowline, and the crossing of a waterway. The associated Form 44 (Document Number 404236142) was included in the Related Forms section of ECMC Document Number 404178102. So as to not disturb the area of field constraint, soil samples were taken at the start and endpoint of the flowline where the area exists. Soil samples were also taken along the flowline any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

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

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

Proposed Groundwater Sampling

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

Groundwater was encountered during flowline decommissioning at three soil sample locations FL01-08@4', FL01-09@4', and FL01-10@4'/FL02-01@4', and three groundwater samples (GW01, GW02, and GW03, respectively) were collected. All groundwater samples were submitted for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, chloride and sulfate anions.

Operator was informed by the laboratory that the sample holding times were exceeded for chloride and sulfate (anions by EPA Method 300.0) for groundwater samples GW01-GW03. Re-sampling of GW02 and GW03 will occur at a later date.

If groundwater is encountered during future site investigation activities, a grab groundwater sample will be collected and analyzed for all organic and inorganic parameters (TDS, chloride, sulfate) compounds per ECMC 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 of the wellhead and flowline areas occurred during decommissioning activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of wellhead decommissioning activities, including field notes, site photos, figures, and laboratory analytical results was included on ECMC Document Number 404055491. A detailed summary of flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results is attached to ECMC Document Number 404178102.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected	14	NA / ND	
Number of soil samples exceeeding 915-1	4	ND	Highest concentration of TPH (mg/kg)
Was the areal and vertical extent of soil contamination delineated?	No	--	Highest concentration of SAR 5.88
Approximate areal extent (square feet)	400		BTEX > 915-1 No
			Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected	3	ND	Highest concentration of Benzene (µg/l)
Was extent of groundwater contaminated delineated?	No	ND	Highest concentration of Toluene (µg/l)
Depth to groundwater (below ground surface, in feet)	4	ND	Highest concentration of Ethylbenzene (µg/l)
Number of groundwater monitoring wells installed	0	ND	Highest concentration of Xylene (µg/l)
Number of groundwater samples exceeding 915-1	3	NA	Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

On January 16, 2025, four background soil samples were collected from two discrete locations (BKG01-BKG02) at depths of 2 feet and 4 feet below ground surface (ft bgs) by Tasman, Inc. On April 1, 2025, six background soil samples were collected from three discrete locations (BKG01-BKG03) at depths of approximately 4 ft and 6 ft bgs by a Chevron business partner. All background soil samples were submitted for analysis of pH, EC, SAR, boron, and metals in soil per ECMC Table 915-1. The maximum background concentration for pH was observed to be 8.57. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, cadmium, lead, and silver were calculated to be 5.08 mg/kg, 219 mg/kg, 0.409 mg/kg,18.0 mg/kg, and 0.114 mg/kg, respectively. All barium concentrations observed in decommissioning and excavation soil samples were below background levels.

☐ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

[X] Is further site investigation required?

Based on the results of flowline decommissioning activities, a remedial excavation will be conducted to remove the benzo(a)anthracene exceedance observed FL01-08. Soil samples will be collected from the base and sidewalls of the final excavation extent submitted for analysis of the full ECMC Table 915-1 suite. Additionally, a supplemental site investigation will be conducted to collect additional soil background samples to further investigate native soil conditions on site. A proposed soil boring location map is attached to ECMC Document Number 404178102.

A monitoring well network will be installed in the vicinity of FL01-08@4' following the completion of remedial excavation activities, and quarterly groundwater monitoring will be conducted until closure criteria are met.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

On April 1, 2025, remedial excavation activities were conducted to remove the 1-methylnaphthalene exceedance observed a wellhead decommissioning soil sample WH01-W@4. Approximately 30 cubic yards of impacted material were removed from the excavation and transported to the North Weld Landfill for disposal under Noble waste manifests.

Analytical results for samples collected during the January 2025 flowline decommissioning activities indicated an additional historic release along the flowline at soil sample FL01-08@4'. Remedial excavation activities will be conducted to remove the hydrocarbon impacted material in the vicinity of the aforementioned soil sample location.

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.

Remedial excavation activities were conducted on April 1, 2025, to remove the hydrocarbon impacted material in the vicinity of wellhead decommissioning soil sample WH01-W@4'. Five soil samples were collected from the final excavation extent and submitted for analysis of the full ECMC Table 915-1 suite. Analytical results indicated that all organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all soil sample locations. Additionally, all inorganic and metals concentrations were in compliance with the applicable ECMC regulatory standards or within background levels in all soil sample locations.

Analytical results collected during the January 2025 flowline decommissioning activities indicated an additional reportable release along the flowline at soil sample FL01-08@4'. Based on the results, a remedial excavation will be conducted to remove the benzo(a)anthracene exceedance observed in the vicinity of the aforementioned soil sample location. Soil samples will be collected from the base and sidewalls of the final excavation extent and submitted for analysis of the full ECMC Table 915-1 suite. Additionally, a supplemental site investigation will be conducted to collect additional soil background samples to further investigate native soil conditions on site. A proposed soil boring location map was attached to ECMC Document Number 404178102.

Groundwater was encountered at the reportable FL01-08@4' location, and at soil sample locations FL01-09@4', and FL01-10@4'/FL02-01@4'. Following the completion of remedial excavation activities, a groundwater monitoring well network will be installed in the vicinity of soil sample FL01-08@4'. Groundwater monitoring will be conducted until closure criteria are met.

Following monitoring well installation activities and the return of analytical results from the first quarterly groundwater monitoring event, a remediation strategy will be selected for this location.

Soil Remediation Summary

[ ] **In Situ**

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

[X] **Ex Situ**

Yes Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) 30

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.

Groundwater was encountered at three locations during flowline decommissioning activities. Three groundwater samples were collected at soil sample locations FL01-08@4' (GW01), FL01-09@4' (GW02), and FL01-10@4'/FL02-01@4' (GW03) and submitted for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), 1,3,5-TMB, chloride and sulfate anions, and total dissolved solids (TDS).

Analytical results indicated that organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all groundwater samples.

Operator was informed by the laboratory that the sample holding times were exceeded for chloride and sulfate (anions by EPA Method 300.0) for groundwater samples GW01-GW03. Re-sampling of GW02 and GW03 will occur at a later date.

Due to GW01 being collected from the same location as reportable soil sample FL01-08@4', Operator will conduct quarterly groundwater monitoring until closure criteria are met. Groundwater samples will be submitted for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, 1-methylnaphthalene, chloride and sulfate anions, and TDS. A monitoring well network will be installed in the vicinity of FL01-08@4' following the completion of remedial excavation activities. TDS concentrations recorded in groundwater samples GW02 and GW03 will be compared to background concentrations following the installation of the above referenced groundwater monitoring network and the establishment of up-/cross-gradient monitoring wells.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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

[X] Other Fourth Quarter 2025 - Timeline Update

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).
If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policies MWZZ316714 and MWZX316724) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: $ 50000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 30

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: North Weld Landfill

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

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

If YES:

[ ] Compliant with Rule 913.h.(1).

[ ] Compliant with Rule 913.h.(2).

[ ] Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

Is additional groundwater monitoring to be conducted?

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and 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?

[X] 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. 12/10/2024

Proposed date of completion of Reclamation. 01/07/2027

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. 01/13/2025

Actual Spill or Release date, or date of discovery. 01/13/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/10/2024

Proposed site investigation commencement. 01/07/2026

Proposed completion of site investigation. 03/31/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/07/2026

Proposed date of completion of Remediation. 07/07/2026

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.

[X] Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The implementation schedule is being updated to reflect the schedule to complete remedial excavation and supplemental site investigation (SSI) activities at the site. Due to agricultural operations on site, remedial excavation and SSI activities were postponed until the crop was harvested. Remedial excavation and SSI activities will be completed during the first quarter of 2026.

OPERATOR COMMENT

This Form 27 is being submitted as a fourth quarter 2025 timeline update for the completion of remedial excavation and supplemental site investigation (SSI) activities at the McMillen Trust 19-14G wellhead and flowline location. ECMC Document No. 404375503 was submitted on October 10, 2025 and was subsequently denied on October 27, 2025 with a COA stating: "ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location." Progress of remediation of impacts is addressed below.

Flowline decommissioning activities were conducted on January 15-16, 2025. Analytical results indicated an additional reportable release along the flowline at soil sample FL01-08@4'.

Based on the results, a remedial excavation will be conducted to remove the benzo(a)anthracene exceedance observed in the vicinity of the aforementioned soil sample location. Soil samples will be collected from the base and sidewalls of the final excavation extent submitted for analysis of the full ECMC Table 915-1 suite. Additionally, a supplemental site investigation will be conducted to collect additional soil background samples to further investigate native soil conditions on site. A proposed soil boring location map is attached to ECMC Document Number 404178102.

Operator was informed by the laboratory that the sample holding times were exceeded for chloride and sulfate (anions by EPA Method 300.0) for groundwater samples GW01-GW03. Operator will not be relying on any results associated with a constituent that was outside of the required holding time. Operator will be collecting replacement samples (GW02 and GW03) and will be submitting them for analysis. Operator will submit the replacement sample laboratory report in a future supplemental Form 27.

Due to GW01 being collected from the same location as reportable soil sample FL01-08@4', Operator will conduct quarterly groundwater monitoring until closure criteria are met. Groundwater samples will be submitted for analysis of BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, chloride and sulfate anions, and TDS. A monitoring well network will be installed in the vicinity of FL01-08@4' following the completion of remedial excavation activities. TDS concentrations recorded in groundwater samples GW02 and GW03 will be compared to background concentrations following the installation of the above referenced groundwater monitoring network and the establishment of up-/cross-gradient monitoring wells.

Per the COA on ECMC Document number 404178102, boring logs will be completed in accordance with standard environmental practices, including lithology description, USCS classifications, PID readings, sample collection depths, depth to water, and well construction (if applicable), and will be included in a subsequent form 27 following SSI activities.

This site is located within an active agricultural field (see attached Site Map for reference). Following the harvest season, excavation and SSI activities will be completed during the first quarter of 2026 and the results of which will be summarized on a subsequent Form 27.

Pursuant to Rule 913.e, Supplemental Form 27s will be submitted on a quarterly schedule to provide updates and progress of the remediation until closure criteria is met.

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

Signed: Jesse Marcus Title: Environmental Consultant

Submit Date: Email: tas-chevron-2@tasman-geo.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: 34834

COA Type	Description
0 COA	

ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num	Name
404439164	SITE MAP

Total Attach: 1 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)