

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404492076

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	<b>Phone Numbers</b>
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 304-5000
City: DENVER State: CO Zip: 80202		Mobile: ( )
Contact Person: Lauren Hoff	Email: RBUEUF27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37265 Initial Form 27 Document #: 403835352

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

Yes Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 123-16819	County Name: WELD
Facility Name: MCCLELLAN 3-32	Latitude: 40.340182	Longitude: -104.655964	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 3	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 491210	API #: _____	County Name: WELD
Facility Name: MCCLELLAN-64N65W-3NWSW	Latitude: 40.340594	Longitude: -104.656096	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 3	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE      Facility ID: 491235      API #: \_\_\_\_\_      County Name: WELD  
 Facility Name: MCCLELLAN 3-32      Latitude: 40.340186      Longitude: -104.655985  
 \*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_      Longitude: \_\_\_\_\_  
 QtrQtr: NWSW      Sec: 3      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**

- Within Mule Deer Severe Winter Range HPH
- Bald Eagle Roost or Communal Roost HPH 0.18mi NE
- Riverine 0.08/0.11mi N
- Freshwater Emergent Wetland 0.02/0.14/0.14/0.2mi NE
- Freshwater Pond 0.2mi E, 0.11mi NE, 0.19mi SE
- Lake 0.13mi E
- Residential 0.17mi SW, 0.18mi W
- Farm Structure 0.14/0.15/0.16/0.25mi SW, 0.18/0.19mi W, 0.17mi NW

# SITE INVESTIGATION PLAN

## **TYPE OF WASTE:**

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

## **DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	Refer to Tables and Figures	Lab Analysis or Field Screening
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 ECMC Rule 911 a site investigation was conducted pertaining to the MCCLELLAN 03-32 wellhead cut and cap and flowline removal. Approximately 149' of flowline was removed on August 18, 2025. The Field Qualitative Criteria Checklist was utilized during decommissioning activities and visual and olfactory observations indicated a potential historical release occurred and an initial Form 19 was submitted under Document Number 404437236.

The wellhead was cut and capped per ECMC rules on August 22, 2025. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. The Field Qualitative Criteria Checklist was utilized during decommissioning activities and visual and olfactory observations indicated a potential historical release occurred and an initial Form 19 was submitted under Document Number 404328136.

## **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 ):

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. A grab confirmation soil sample was collected at the wellhead excavation, and 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**

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

Groundwater was encountered and sampled during site investigation activities. One groundwater sample (GW01 at 4' bgs) was collected in the former wellhead excavation and was submitted for laboratory analysis of BTEX, naphthalene, TMBs, chloride, TDS, and sulfate.

### **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 abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The ECMC Flowline Closure and Wellhead Closure Checklists were utilized and filled out during the abandonment process. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 2  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 0

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 3.32  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 3

### Groundwater

Number of groundwater samples collected 1  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 4  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 22.3  
-- Highest concentration of Toluene (µg/l) 97.3  
-- Highest concentration of Ethylbenzene (µg/l) 33  
-- Highest concentration of Xylene (µg/l) 355  
NA Highest concentration of Methane (mg/l) \_\_\_\_\_

### Surface Water

0 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?

Were background samples collected as part of this site investigation?

Nine background soil samples were collected on August 18, 2025 and analyzed for Table 915-1 metals in soil and Soil Suitability for Reclamation parameters per ECMC Table 915-1. The background soil samples were collected from a depth of 0.5, 3, and 4 feet below ground surface (ft bgs). The lithology between the site and background locations was observed to be well graded sands. The maximum background concentration for EC is 12.4. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and chromium (VI) were calculated to be 5.70 mg/kg at 3 ft bgs, 104.6 mg/kg at 3 ft bgs, and 0.14 mg/kg at 0.5 ft bgs, respectively. All EC, arsenic, barium, and chromium (VI) concentrations observed during decommissioning were below maximum and 1.25x maximum background levels. As such, EC, arsenic, barium, and chromium (VI) should be considered resolved. Additional background samples will be collected to determine site specific background concentrations of pH and lead.

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?

Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, background soil samples will be collected to determine if elevated levels of pH and lead are attributed to native soil conditions at the site. Background soil samples will be analyzed by a certified laboratory for analysis of metals per ECMC Table 915-1 and soil suitability parameters including pH, EC, SAR, and boron. Proposed background soil sample locations are shown on the attached proposed excavation map.

## 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.

The VOC and PAH exceedances observed at sample locations WH01@4', WH01-W@3', and WC-1 on August 22, 2025 will be removed through a remedial excavation in accordance with the proposed excavation map attached to this Form 27. Soil samples will be collected from the base and sidewalls of the respective final excavation extents and will be submitted for analysis of the full ECMC Table 915-1 suite.

### 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.

Concurrently with the remedial excavation that is proposed in the Remedial Action Plan section of this Form 27, background soil samples will be collected to determine if elevated levels of pH and lead are attributed to native soil conditions at the site. Background soil samples will be analyzed by a certified laboratory for analysis of metals per ECMC Table 915-1 and soil suitability parameters including pH, EC, SAR, and boron. Proposed background soil sample locations are shown on the attached proposed excavation map.

**Soil Remediation Summary**

In Situ

Ex Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

- \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_
- \_\_\_\_\_ 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 and sampled during site investigation activities. One groundwater sample (GW01 at 4' bgs) was collected in the former wellhead excavation and was submitted for laboratory analysis of BTEX, naphthalene, TMBs, chloride, TDS, and sulfate. Analytical results indicated organic compounds were detected above Table 915-1 (benzene and 1,2,4-trimethylbenzene). After the completion of the SSMR excavation, groundwater monitoring wells will be installed in the former excavation area and nearby background areas to monitor groundwater.

# 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 Decommissioning Sample Summary, Supplemental Source Mass Removal and Site Investigation Proposals

## 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. 08/18/2025

Proposed date of completion of Reclamation. 10/31/2027

## 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. 06/27/2024

Actual Spill or Release date, or date of discovery. 08/22/2025

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 08/18/2025

Proposed site investigation commencement. 03/18/2026

Proposed completion of site investigation. 07/18/2026

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 07/18/2026

Proposed date of completion of Remediation. 01/18/2027

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 MCCLELLAN 03-32 wellhead and flowline and necessity for remedial excavation activities adjacent to the wellhead and flowline.

**OPERATOR COMMENT**

This Form 27 is being submitted to include a 1Q 2026 update for the MCCLELLAN 03-32 wellhead (REM #37265) and decommissioning results and historic reportable release discovered at the former wellhead location. A proposal to excavate the VOC and PAH exceedances identified during decommissioning (soil samples WH01@4', WH01-W@3', and WC-1) is presented in the Remedial Action Plan section of this Form 27. Based on visual and olfactory observations on August 22, 2025 a potential historic release at the wellhead was reported under Form 19 Document Number 404328136. Approximately 149' of flowline was removed on August 18, 2025. Based on visual and olfactory observations on August 18, 2025 a potential historic release was reported under Form 19 Document Number 404437236.

The August 22, 2025 wellhead decommissioning data was reported under Form 27 Document Number 404327579.

Nine background soil samples were collected on August 18, 2025 and analyzed for Table 915-1 metals in soil and Soil Suitability for Reclamation parameters per ECMC Table 915-1. The background soil samples were collected from a depth of 0.5, 3, and 4 feet below ground surface (ft bgs). The lithology between the site and background locations was observed to be well graded sands. The maximum background concentration for EC is 12.4. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and chromium (VI) were calculated to be 5.70 mg/kg at 3 ft bgs, 104.6 mg/kg at 3 ft bgs, and 0.14 mg/kg at 0.5 ft bgs, respectively. All EC, arsenic, barium, and chromium (VI) concentrations observed during decommissioning were below maximum and 1.25x maximum background levels. As such, EC, arsenic, barium, and chromium (VI) should be considered resolved. Additional background samples will be collected to determine site specific background concentrations of pH and lead.

Groundwater was encountered and sampled during site investigation activities. One groundwater sample (GW01 at 4' bgs) was collected in the former wellhead excavation and was submitted for laboratory analysis of BTEX, naphthalene, TMBs, chloride, TDS, and sulfate. Analytical results indicated organic compounds were detected above Table 915-1 (benzene and 1,2,4-trimethylbenzene). After the completion of the SSMR excavation, groundwater monitoring wells will be installed in the former excavation area and nearby background areas to monitor groundwater.

Pursuant to Rule 913.e, quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation will be submitted on 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: Kayla White, P.E.

Title: Environmental Consultant

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

Email: CVX-PM@cdhconsult.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: 37265

<b>COA Type</b>	<b>Description</b>
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.

<b>Att Doc Num</b>	<b>Name</b>
404501293	LABORATORY ANALYTICAL REPORT
404501295	LABORATORY ANALYTICAL REPORT
404501297	LABORATORY ANALYTICAL REPORT
404501299	LABORATORY ANALYTICAL REPORT
404502835	SITE INVESTIGATION REPORT

Total Attach: 5 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
		Stamp Upon Approval

Total: 0 comment(s)