

State of Colorado  
Energy & Carbon Management Commission

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Report taken by:  
Nick Cholas

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25098 Initial Form 27 Document #: 403160684

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: \_\_\_\_\_

SITE INFORMATION

No Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 123-18227	County Name: WELD
Facility Name: MCALLISTER 32-12	Latitude: 40.328536	Longitude: -104.609339	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 12	Twps: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Prairie Land  
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes  
Is groundwater less than 20 feet below ground surface? No

**Other Potential Receptors within 1/4 mile**

Division of Water Resources (DWR) permit 323948- is located 0.12 miles northeast of the Location. Residential structures are located 0.16 miles northwest, 0.11 and 0.14 miles east, 0.04 and 0.07 miles southeast, 0.22 miles southwest, and 0.04 and 0.15 miles west of the Location. An unnamed lake is located 0.23 miles northeast of the Location.

**SITE INVESTIGATION PLAN**

**TYPE OF WASTE:**

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

**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Field-Screening and Laboratory Analysis, if Encountered
Yes	SOILS	Refer to Tables and Figures	Field-Screening and Laboratory Analysis, if Encountered

**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, site investigations were conducted by a previous consultant pertaining to the MCALLISTER #32-12 wellhead cut and cap and flowline removal. Approximately 258 feet of flowline was removed and received a No Further Action Status from ECMC. See Form 27 Document 403456428 for details.

On 10/26/2022, initial wellhead characterization was completed by a previous consultant following cut and cap activities. Five soil samples were collected for field-screening: one from the base of the excavation and one from each sidewall. The base sample was submitted for laboratory analysis of ECMC Table 915-1 organic and SSR constituents. Laboratory results reported compliance for all analyzed constituents except pH. This sample has been included in Chevron's data integrity review and will be recharacterized in accordance with the approved Form 27 investigation plan. As the sample from October 26, 2022, was deemed to be invalid, it will not be used for site compliance and will not be included in subsequent reporting. The results were reported in Document 404067305.

On 9/24/2025, a site investigation was completed by a previous consultant to obtain valid point of compliance data at the wellhead investigation area. Fourteen soil samples were collected and submitted for laboratory analysis of all Table 915-1 constituents. Twelve samples were collected in the cardinal directions of the wellhead (WH-01-N, WH-01-S, WH-01-E, and WH-01-W), each collected at 4, 6, and 8 ft bgs, respectively. Two samples were collected at the base of the wellhead (WH-01) at 6 and 8 ft bgs. Three background soil samples were collected, however, these samples appear to have been collected in disturbed areas and will not be used for site compliance. Laboratory results of wellhead samples were compliant with applicable standards except EC, boron, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium. See attached laboratory report and site investigation report for details.

**PROPOSED SAMPLING PLAN**

**Proposed Soil Sampling**

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

The background samples collected on September 24, 2025, appear to have been collected in a disturbed area and will therefore not be used for compliance. Additional background samples will be collected to establish the range of values for naturally occurring inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further delineation may be completed at the wellhead site investigation areas to address elevated pH, EC, boron, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium. A proposed supplemental site investigation plan (SSIP) is attached.

**Proposed Groundwater Sampling**

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

No groundwater has been encountered during site investigation activities. If groundwater is encountered, a grab groundwater sample will be collected and analyzed for full 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 ):

Field personnel field-screened all disturbance areas using visual and olfactory senses to determine if laboratory analysis was required.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 14  
Number of soil samples exceeding 915-1 14  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 1400

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 4.05  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 8

### Groundwater

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) \_\_\_\_\_  
Number of groundwater monitoring wells installed \_\_\_\_\_  
Number of groundwater samples exceeding 915-1 \_\_\_\_\_

Highest concentration of Benzene (µg/l) \_\_\_\_\_  
Highest concentration of Toluene (µg/l) \_\_\_\_\_  
Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
Highest concentration of Xylene (µg/l) \_\_\_\_\_  
Highest concentration of Methane (mg/l) \_\_\_\_\_

### Surface Water

0 Number of surface water samples collected  
\_\_\_\_ Number of surface water samples exceeding 915-1  
If surface water is impacted, other agency notification may be required.

## OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

On September 24, 2025, background soil samples were collected and analyzed for Table 915-1 inorganics. However, these samples appear to have been collected within disturbed areas. Additional, background samples will be collected to establish the range of values for naturally occurring inorganic constituents in the project area.

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?

Additional background samples will be collected to establish the range of values for naturally occurring inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further delineation may be completed at the wellhead site investigation areas to address elevated pH, EC, boron, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium. A proposed supplemental site investigation plan (SSIP) is attached.

## REMEDIAL ACTION PLAN

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

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

No soil exceedances resulting from oil and gas operations have been identified. Should impacted material be identified at any point during the site investigation, a removal summary will be provided.

### 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.

No soil exceedances resulting from oil and gas operations have been identified with this project. Should impacted material be identified at any point during site investigation efforts, a remedial investigation will be undertaken and a summary of those efforts will be provided.

## Soil Remediation Summary

In Situ

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

Ex Situ

\_\_\_\_\_ 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 not encountered during decommissioning efforts or subsequent site investigation activities.

# REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

### Approved Reporting Schedule:

Quarterly     Semi-Annually     Annually     Other

### Request Alternative Reporting Schedule:

Semi-Annually     Annually     Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type:     Groundwater Monitoring     Land Treatment Progress Report     O&M Report

Other Quarterly Update, SSI Results, and SSIP

## Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

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

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

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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

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

E&P waste (solid) description \_\_\_\_\_

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

Non-ECMC Disposal Facility: \_\_\_\_\_

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

E&P waste (liquid) description \_\_\_\_\_

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

Non-ECMC Disposal Facility: \_\_\_\_\_

# REMEDIATION COMPLETION REPORT

## REMEDIATION COMPLETION SUMMARY

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

If YES:

Compliant with Rule 913.h.(1).

Compliant with Rule 913.h.(2).

Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

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

## RECLAMATION PLAN

### RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be in accordance with ECMC 1000 Series Rules.

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

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

Interim  Final

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

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

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

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/31/2026

Proposed date of completion of Reclamation. 10/31/2028

## 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. 10/21/2021

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/16/2022

Proposed site investigation commencement. 09/16/2022

Proposed completion of site investigation. 03/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

Proposed date of completion of Remediation. \_\_\_\_\_

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 adjusted to reflect the status of site investigation efforts and anticipated dates for completion. Additional site investigation to characterize native soil conditions is tentatively scheduled to be completed by the end of the first quarter of 2026 and results will be reported in a subsequent Form 27.

## OPERATOR COMMENT

This form has been submitted to satisfy the quarterly reporting requirement for MCALLISTER #32-12 (Remediation Project 25098), provide results of the September 24, 2025 SSI, and to propose additional background soil sampling. Remediation and site investigation, previously directed by a former consultant, is now under the direction of Confluence. Confluence plans to conduct the proposed SSI in accordance with the proposed implementation schedule and the SSIP attached to this form submittal. The results will be submitted in a subsequent Form 27.

In response to Form 27 COA from Document 404396416, issued and denied on November 4, 2025, a secured laboratory analytical report was attached to Document 404423879 on November 26, 2025. The ECMC returned the document to draft with the request that the attachment be removed.

SSR and metal exceedances have been reported in the investigation area. Background samples collected September 24, 2025, appear to have been collected within a disturbed area and will not be used for site compliance. Therefore, additional background samples will be collected to establish the range of values for naturally occurring inorganic constituents in the project area. If background sampling efforts fail to demonstrate that inorganic constituent values remaining at the Location are within the natural range of values in the project area, further delineation may be completed at the wellhead site investigation areas to address elevated pH, EC, boron, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium. A proposed supplemental site investigation plan (SSIP) is attached.

As part of Chevron's Data Integrity review, all point of compliance samples have been recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project.

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

Signed: Chris McKisson

Title: Sr. Scientist

Submit Date: 02/04/2026

Email: CVX-REMS@confluence-cc.com

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

ECMC Approved: Nick Cholas

Date: 02/11/2026

Remediation Project Number: 25098

### COA Type

### Description

	ECMC approves the proposed soil boring locations. Depending on the results of the current site investigation plan, Operator may be required to complete additional soil borings to fully delineate soil impacts.
	In addition to background sampling, operator shall fully delineate the vertical and horizontal extent of impacts at the well head.
2 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

404523718	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
404523876	ANALYTICAL RESULTS
404531771	SITE INVESTIGATION PLAN
404542446	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

### General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)