

State of Colorado  
Energy & Carbon Management Commission

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Report taken by:  
Abdul Elnajdi

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 #: 30240 Initial Form 27 Document #: 403421220

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 #: 123-24609	County Name: WELD
Facility Name: BROWN-USX AA 3-23	Latitude: 40.512320	Longitude: -104.417940	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSE	Sec: 3	Twp: 6N	Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland  
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? No

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

Well Within Pronghorn Winter Concentration Area HPH  
Mule Deer Severe Winter Range HPH 0.03mi NW  
Aquatic Native Species Conservation Waters HPH 0.01mi W  
Freshwater Emergent Wetland 0.10mi 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	NA	Lab analysis and field screening if encountered
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 BROWN USX AA03-23 wellhead cut and cap. 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. The flowline was previously abandoned on 11/5/2018, and the ECMC was notified on Form 44 Document Number 403216829.

On 7/27/2023, five (5) grab soil samples were collected at the wellhead excavation sidewalls and floor. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods. All organic concentrations and soil suitability parameters were in compliance with ECMC Table 915-1, but all 5 samples contained metals above 915-1 limits. This data was collected by a prior consultant and will not be used for closure. Confirmation sampling for recollection of these samples will occur.

On 10/30/2024 Ten (10) additional background soil samples at 7-9 ft were collected and analyzed SSR and metals. This data was collected by a prior consultant and was not utilized in the site background determination/compliance evaluation process.

On 6/13/2025 four (4) additional background soil samples were collected to further define the background soil conditions and submitted for ECMC table 915-1 SSR and metals analysis. Analytical results are attached to this SF27.

**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 site assessment will be scheduled to collect confirmation samples at the wellhead and additional background samples.

Five confirmation samples will be collected at prior consultant wellhead sample locations. Five additional background boring locations will be collected with samples at 4, 7, and 9 feet bgs.

All confirmation soil samples will be analyzed for the full ECMC Table 915-1 analytical suite, while background samples will be analyzed for SSR compounds and metals. Sample locations are provided on the attached site investigation plan.

**Proposed Groundwater Sampling**

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

If encountered, groundwater will be sampled for the full Table 915-1 list of constituents.

**Proposed Surface Water Sampling**

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

No surface water was discovered in the vicinity of the wellsite during the plugging and decommissioning activities. No surface water samples were collected for this project.

**Additional Investigative Actions**

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

Visual inspection of the wellhead area 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 Wellhead Closure Checklist was utilized and filled out during the initial abandonment activities.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 0

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

NA Highest concentration of TPH (mg/kg) \_\_\_\_\_

NA Highest concentration of SAR \_\_\_\_\_

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?

Eleven background samples have been collected by a previous consultant. Background data collected by previous consultant was not utilized in the site background determination/compliance evaluation process.

Four background samples have been collected within an area subject to historical oil and gas activities. This data was not utilized in the site background determination/compliance evaluation process.

Additional background soil samples will be obtained sufficiently away from the investigation areas to reflect native conditions not impacted by oil and gas activity, and from similar depths and lithologic materials for comparison to confirmation soil sample results. Background samples will be analyzed for ECMC Table 915-1 SSR parameters and metals.

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?

A site assessment will be scheduled to collect confirmation samples at the wellhead and additional background samples.

Five confirmation samples will be collected at prior consultant wellhead sample locations. Five additional background boring locations will be collected with samples at 4, 7, and 9 feet bgs.

All confirmation soil samples will be analyzed for the full ECMC Table 915-1 analytical suite, while background samples will be analyzed for SSR compounds and metals. Additional site investigation is estimated to begin Q1 - Q2 2026, pending site access. Sample locations are provided on the attached site investigation plan.

## 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 impacted material caused by oil and gas operations was identified at this time.

## 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.

NA

## Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

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

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

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

\_\_\_\_\_ 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 was not encountered during the initial decommissioning event or subsequent supplemental site investigation activity.

# 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, Site Investigation Reporting, Site Investigation Plan, Decommissioning Report \_\_\_\_\_

## 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? No

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

Does Groundwater meet Table 915-1 standards? Yes

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. 07/27/2023

Proposed date of completion of Reclamation. 02/03/2028

## 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. 05/16/2023

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/27/2023

Proposed site investigation commencement. 06/02/2023

Proposed completion of site investigation. 12/31/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2026

Proposed date of completion of Remediation. 12/31/2027

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:

Implementation schedule updated to reflect the schedule to complete additional site investigation. Additional site investigation is estimated to begin Q1 - Q2 2026, pending site access. The ECMC will be updated on a subsequent Form 27 with the results of the additional site investigation, or if the schedule is changed.

## OPERATOR COMMENT

This 1Q2026 Supplemental Form 27 for Brown-USX AA 3-23 (Rem# 30240) summarizes the 10/30/2024 and 6/13/2025 site investigations and proposes an additional supplemental site investigation (SSI).

The Brown-USX AA 3-23 wellhead cut and cap was completed on 7/27/2023 and flowline previously abandoned on 11/5/2018, F44 Doc # 403216829. On 7/27/2023 Five analytical soil samples were collected at the wellhead and were analyzed for all ECMC Table 915-1 analytes. One background sample was collected and analyzed for Table 915-1 soil suitability for reclamation (SSR) and metal analytes. All organic concentrations and soil suitability parameters for the wellhead samples were in compliance with ECMC Table 915-1, but all 5 samples had elevated metal detections (SF27 Doc. #s 403736789 and 404177664).

An additional site investigation was completed by a prior consultant on 10/30/2024 to collect additional background samples. Five background borings were advanced (Background-02 - Background-06) with two grab soil samples collected at each boring for a total of ten additional background samples. Background data collected by previous consultant was not utilized in the site background determination/compliance evaluation process. Further details are included in the attached site investigation report.

An additional site investigation to collect background samples was completed on 6/13/2025. Four background samples were collected. The four samples were collected from within an area subject to historical oil and gas activities, therefore the data is not being relied upon to establish site specific background values. Further details are included in the attached site investigation report.

A SSI will be scheduled to collect confirmation wellhead closure samples of WH-FS-01 @8' and WH-SS-01 @7' - WH-SS-04 @7' (30240-WH-01 - 30240-WH-05). Five background boring locations will be advanced sufficiently away from the investigation area to reflect native conditions not impacted by oil and gas activity, with samples collected at 4, 7, and 9 feet bgs intervals (30240-BG-05 - 30240-BG-09). Confirmation soil samples will be analyzed for the full ECMC Table 915-1 analytical suite, while background samples will be analyzed for SSR compounds and metals. The SSI is estimated to begin Q1 - Q2 2026. Sample locations are provided in the attached site investigation plan.

Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical report from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original report with additional protections (Reissued Report). The Reissued Report was received directly from the lab on 2/13/2025 which includes a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance. The metadata associated with this Reissued Report also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Report is attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information.

Pursuant to Rule 913.e, quarterly reporting will continue for the location until data indicates no further action is warranted.

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

Signed: Ryan Plath

Title: Environmental Consultant

Submit Date: 02/23/2026

Email: cvxform27@erm.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: Abdul Elnajdi

Date: 02/23/2026

Remediation Project Number: 30240

## COA Type

## Description

COA Type	Description
1 COA	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.

## 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

Att Doc Num	Name
404299340	FORM 27-SUPPLEMENTAL-SUBMITTED
404541440	SITE INVESTIGATION PLAN
404541454	SITE INVESTIGATION PLAN
404541784	OTHER
404541787	LABORATORY ANALYTICAL REPORT
404541802	LABORATORY ANALYTICAL REPORT
404541803	SITE INVESTIGATION REPORT

Total Attach: 7 Files

Date Run: 2/23/2026 Doc [#404299340]

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## General Comments

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

Total: 0 comment(s)