

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404580343

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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	<b>Phone Numbers</b>
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(970) 304-5000</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>( )</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 37313 Initial Form 27 Document #: 403847099

**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: <u>WELL</u>	Facility ID: _____	API #: <u>123-27389</u>	County Name: <u>WELD</u>
Facility Name: <u>CECIL USX AB 35-14</u>	Latitude: <u>40.523867</u>	Longitude: <u>-104.520241</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>35</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488480</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Cecil USX AB35-14</u>	Latitude: <u>40.523859</u>	Longitude: <u>-104.520259</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>35</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## **SITE CONDITIONS**

General soil type - USCS Classifications SW \_\_\_\_\_

Most Sensitive Adjacent Land Use Cropland \_\_\_\_\_

Is domestic water well within 1/4 mile? No \_\_\_\_\_

Is surface water within 1/4 mile? No \_\_\_\_\_

Is groundwater less than 20 feet below ground surface? No \_\_\_\_\_

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

Within Mule Deer Severe Winter Range HPH  
Within Pronghorn Winter Concentration Area HPH  
Residential 0.1mi W, 0.17mi SW  
Farm Structure 0.07mi W, 0.17/0.19/0.22mi SW

# 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
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 Cecil USX AB35-14 wellhead cut and cap. The wellhead was cut and capped per ECMC rules. Laboratory analytical results indicated a historical release occurred at the decommissioned wellhead and was reported under Initial Form 19 Document Number 403988522. Please refer to the operator comments for additional information regarding the historical release and remedial efforts that were conducted at the wellhead.

The flowline was previously abandoned on 12/18/2018, and the ECMC was notified on Form 44 Document number 403216829.

## 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 ):

Confirmation soil samples were taken from sidewalls and base of the final extents of the excavation at the wellhead. However, an organic exceedance still remains in one of the sidewall samples. Following additional source mass removal of hydrocarbon impacted soil, confirmation soil samples will be collected from the final extents of the excavation. 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. Background soil samples will be analyzed for analysis of metals per ECMC Table 915-1 and soil suitability parameters including pH, EC, SAR, and boron.

### Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

### 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 area occurred during decommissioning 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 abandonment process. A photolog was previously submitted.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 5  
Number of soil samples exceeding 915-1 1  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 152

### NA / ND

-- Highest concentration of TPH (mg/kg) 0.296  
-- Highest concentration of SAR 2.8  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 6

### 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?

Six site specific background soil samples collected from approximately 6.5 ft., and 13 ft-bgs from three soil borings (BKG01-BKG03) were submitted for analysis of pH, EC, SAR, and total metals (Table 915-1 List) by ECMC approved methods.

The excavation soil samples collected from the wellhead excavation were all classified as clayey sands (SC). The six background soil samples were collected from the same depths as the confirmation soil samples with similar soil classification as the excavation samples, well-graded sands (SW), silty sands (SM), and clayey sands (SC).

All analytical results for soil samples submitted for analysis are compliant with their respective Table 915-1 GWSSLs or below the maximum background concentration for pH (8.51) or 1.25x the highest background concentrations for arsenic (9.51 mg/kg) and lead (18.3 mg/kg), except for 1-methylnaphthalene (0.008 mg/kg) and selenium (0.415 mg/kg) in EX05@6.5.

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 source mass removal of remaining hydrocarbon impacted soil at the west sidewall of the initial remedial excavation (soil sample EX05@6.5) is to be conducted.

Noble proposes to conduct additional background soil sampling from boring locations at similar depths and soil horizons as confirmation soil samples, in areas away from oil and gas infrastructure to further investigate residual inorganic concentrations in soil at the wellhead, as shown in the attached Figure 3.

## 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 March 13 and 14, 2025, excavation was conducted to remove the impacted soil at the former Cecil USX AB35-14 wellhead. Four confirmation soil samples (EX02 through EX05) were collected from the sidewalls of the excavation from approximately 6.5 ft-bgs and one confirmation soil sample (EX01) was collected from the floor of the excavation from approximately 13 ft-bgs. The final extent of the excavation was approximately 12 feet by 13 feet to a total depth of 13 ft-bgs. Approximately 160 cubic yards of presumably impacted soil were removed and hauled off site for disposal under Noble manifest to Waste Management's North Weld Landfill in Ault, Colorado in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

## 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.

The impacted soil was excavated and hauled offsite to a permitted disposal facility. However, the final analytical results confirm the presence of remaining organic exceedances at the west sidewall (EX05@6.5) of the remedial excavation. Please refer to the Operator Comments section of this Form 27 for additional discussion.

**Soil Remediation Summary**

In Situ

Ex Situ

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

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

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

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 160

\_\_\_\_\_ 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 wellhead decommissioning activities or during initial source mass removal 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 Timeline Update 1Q26, 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? 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 160

E&P waste (solid) description Hydrocarbon impacted soils

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

Non-ECMC Disposal Facility: Waste Management's North Weld Landfill in Ault, Colorado

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? 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? No

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

Did the local soil conservation district provide the seed mix? No

### **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 11/06/2024

Proposed date of completion of Reclamation. 11/06/2026

## 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. 11/06/2024

Actual Spill or Release date, or date of discovery. 11/06/2024

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 11/06/2024

Proposed site investigation commencement. 11/06/2024

Proposed completion of site investigation. 06/30/2026

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 10/13/2025

Proposed date of completion of Remediation. 10/31/2026

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.

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

Basis for change in implementation schedule:

Organic exceedances remain after initial remedial excavation activities. Additional source removal activities will commence as soon as possible. A qualified excavation crew is not immediately available but is expected to commence by the end of 2Q26. The implementation schedule has been updated to reflect these changes.

**OPERATOR COMMENT**

This form is being submitted as a 1Q26 timeline update for the Cecil USX AB35-14 wellhead and in connection with the historical release that was submitted in the Form 19 submitted under Document 403988522.

Supplemental source mass removal activities at the former wellhead will be initiated via mechanical excavation as soon as possible. A qualified excavation crew is not immediately available but is expected to commence the work by the end of 2Q26.

Following source mass removal excavation activities, Noble proposes to conduct background soil sampling from boring locations at similar depths and soil horizons as excavation soil samples, in areas away from oil and gas infrastructure to further investigate residual inorganic concentrations in soil at the wellhead. Please refer to the attached Figure 3 for proposed background sample locations.

The flowline was previously abandoned on 12/18/2018, and the ECMC was notified on Form 44 Document number 403216829.

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: Chelsea Veryser

Title: Project Geologist

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

Email: chevronfr@entradainc.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: 37313

**COA Type****Description**

0 COA	
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**ATTACHMENT LIST**

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

**Att Doc Num****Name**

404580344	ANALYTICAL DATA SUMMARY TABLE(S)
404580345	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

**General Comments****User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)