

BEFORE THE ENERGY AND CARBON MANAGEMENT COMMISSION
OF THE STATE OF COLORADO

IN THE MATTER OF ALLEGED VIOLATIONS OF)	CAUSE NO. 1V
THE RULES AND REGULATIONS OF THE)	
COLORADO ENERGY AND CARBON)	DOCKET NO. 260200039
MANAGEMENT COMMISSION BY NOBLE)	TYPE: ENFORCEMENT
ENERGY, INC. , WELD COUNTY, COLORADO)	
)	ORDER NO. 1V-1014

ADMINISTRATIVE ORDER BY CONSENT

(Pursuant to Rule 523.d of the Rules and Regulations of the
Colorado Energy and Carbon Management Commission, 2 CCR 404-1)

FINDINGS

1. Noble Energy, Inc. (Operator No. 100322) (“Noble”) is a registered oil and gas operator in the State of Colorado. Noble is a related entity to Chevron U.S.A. Inc.

2. Noble is the operator of record for the Bishop A18-742 well (API No. 123-52071) located in Weld County (the “Well”). The Well is located on the A09-01 Pad (Facility ID 483510) (the “Location”).

The Release

3. On April 6, 2025, a failure of the designed well barriers occurred, which led to a loss of control over the pressure within the wellbore at the Well, resulting in an uncontrolled flow of fluids from the wellbore (the “Release”). That same day, Noble deployed its Incident Management Team (“IMT”), evacuated the pad site, notified the Energy and Carbon Management Commission (“ECMC” or “Commission”) and various other government agencies, and began responsive action.

4. Local authorities created a one-half mile voluntary exclusion zone and nearby residents were alerted of the Release and advised by local authorities to temporarily relocate. Roadblocks were established to further secure the Location, ensure worker safety, and to prevent the public from accessing the site.

5. Galeton Elementary School, which is located approximately one mile away from the Well, was closed at the time of the Release and remained closed at the direction of the Eaton School District between April 7 and April 18, 2025.

6. On April 7, 2025, ECMC Staff inspected the Location and observed that the loss of well control and fluids was ongoing. Doc. No. 717701311. During the inspection, Staff observed oil, gas, hydraulic fracturing fluids, exploration and production waste (“E&P Waste”), and sand flowing from the well. *Id.* The fluids and gases were carried by wind off the Location to surrounding surface waters, roads, fields, homes, wildlife habitat, and livestock. *Id.*

7. A “Unified Incident Command” composed of Weld County first responders, Galeton Fire Protection, Noble’s IMT, and the U.S. Environmental Protection Agency oversaw the initial response action. Once the Well was declared secured and under control on April 11, 2025, ECMC assumed jurisdiction over the Well, Location, and remediation efforts.

8. Noble filed a Form 19 Initial, Spill/Release Report with ECMC on April 9, 2025. Doc. No. 404156194. The Form 19 Initial reported that the Well lies within Mule Deer Severe Winter Range High Priority Habitat and that the Release may impact or threaten to impact wildlife. *Id.*

9. On April 10, 2025, Noble contained the Release and stopped the flow of fluids from the Well.

10. That same day, Noble submitted a Form 22 Accident Report to ECMC that reported an individual suffered an injury during the Release and that a full investigation into the root cause of the Release was underway. Doc. No. 404161431. Noble submitted an Accident Report Update to ECMC on June 10, 2025, which reported that the Release was caused by the improper assembly and setting of certain equipment at the Well and confirmed that an individual suffered a leg fracture during the Release. Doc. No. 404234441.

11. On April 11, 2025, the Well was declared secured and under control.

12. On April 17, 2025, Noble submitted an Environmental Sampling and Analysis Plan to ECMC. Doc. No. 2615837.

13. On April 25, 2025, Noble submitted its Form 27 Initial Site Investigation and Remediation Plan to ECMC. Doc. No. 404175397. Attached to the Form 27 Initial were four additional Sampling and Analysis Plans for groundwater monitoring well sampling, water well sampling, environmental sampling of soils and surface waters, and confirmation wipe sampling for offsite structures, as well as a Soil Sampling Locations Plan (collectively, “Sampling and Analysis Plans”). Doc. Nos. 404180161, 404180161, 404180163, 404180166, and 404180168. Noble later submitted an Agronomic Sampling and Analysis Plan to ECMC for approval. Doc. No. 404216893.

14. The Form 27 Initial reported that the Release involved a discharge of oil, produced water, drilling fluids, condensate, other E&P Waste, and pigging waste¹ which may impact or threaten to impact water, soil, and vegetation both inside and outside the Location. Doc. No. 404175397. Noble has subsequently submitted voluminous sampling and analysis data to ECMC regarding the nature and extent of the initially reported impacts or threatened impacts.

¹ Pigging waste was reported on the Form 27 Initial in error. Form 27 Supplementals reported “Workover Fluids” instead.

15. Willow Creek, a Water of the State as that term is defined in ECMC's 100-Series Rules, is located approximately 1,090 feet southwest of the Location.

16. As of December 10, 2025, the date of the most recently approved Form 27 Supplemental, Noble has collected 2,149 surface water samples from Willow Creek. Doc. No. 404463847. The analytical data submitted alongside the Form 27 Supplemental indicated that the surface water in Willow Creek experienced short term water quality exceedances due to the Release. Doc. No. 404433114.

17. Noble has completed extensive remedial actions at the Location such as excavating soil and implementing stormwater best management practices to reduce the likelihood of potential contamination of surface water resulting from the remediation of the Release. *Id.*

18. A contractor for Noble submitted data to the Colorado Department of Public Health and Environment's Air Pollution Control Division reporting detections of benzene in the air during the Release.² None of the air quality measurements taken by Noble's contractor or responding agencies exceeded the health guideline levels for exposure to benzene.³

19. Noble submitted a Form 27 Supplemental to ECMC on November 20, 2025, indicating exceedances of Table 915-1 soil screening values for certain constituents and Noble is continuing to investigate and remediate soil impacts at the Location and off-Location parcels of land. Doc. No. 404441900. Noble will continue to remediate the affected Location and off-Location properties until soil sampling and analytical data demonstrates that the constituents are below Table 915-1 values. To date, over 11,000 environmental samples have been collected for analysis.

20. Additional information concerning the Release and Noble's associated mitigation, monitoring, and remediation work are described on webpages maintained by ECMC,⁴ Weld County,⁵ and Noble,⁶ and in Noble's Answer to the NOAV Doc. No. 404309703.

The NOAV

21. On June 26, 2025, ECMC Enforcement Staff issued Notice of Alleged Violation ("NOAV") No. 404256913 to Noble, alleging violations of Rules 428.a., 602.c., 608.e., 902.a.-c., 902.d., and 903 of ECMC's Rules of Practice and Procedure, 2 CCR 404-1 ("Rules" collectively or "Rule" individually).

² ECMC, *Questions & Answers Regarding the Bishop Well Control Incident in Weld County* (April 15, 2025).

³ Weld County, *Data without context is detrimental* (May 23, 2025).

⁴ ECMC, *Bishop Well Control Incident*, <https://ecmc.colorado.gov/bishop-well-control-incident>.

⁵ Weld County, *Bishop Well Incident*, <https://www.weld.gov/Government/Departments/Public-Information-Office/Bishop-Well-Incident>.

⁶ Chevron, *Bishop Well Incident*, <https://colorado.chevron.com/bishop-well-incident>.

22. On June 26, 2025, Noble accepted service of the NOAV by electronic mail and waived service by certified U.S. mail.

23. On August 7, 2025, Noble timely filed its Answer to the NOAV. Doc. No. 404309703.

24. Although the NOAV did not allege a Condition of Approval violation, for purposes of settlement and administrative efficiency the ECMC Staff and Noble have agreed to a COA violation related to the timing of the submission of analytical data to ECMC for soil samples collected from the Galeton Elementary School grounds on May 3 and 4, 2025.

Rule 428.a

25. Rule 428.a. requires operators to take all reasonable precautions to prevent any oil, gas, or water from flowing uncontrolled during well operations and to take immediate steps and exercise due diligence to bring under control any such well.

26. Noble's Form 19 Initial Spill/Release Report reported that the Release involved a loss of well control. Doc. No. 404156194. In addition, Noble's Accident Report Update reported that the loss of well control was caused by the improper assembly and setting of certain equipment at the Well. Doc. No. 404234441.

27. The NOAV alleges that Noble violated Rule 428.a. because it failed to take all reasonable precautions to prevent any oil, gas, or water from flowing uncontrolled during the Release.

Rules 902.a., 902.b., and 902.c.

28. Rule 902.a. requires operators to prevent pollution.

29. Rule 902.b. requires operators to prevent adverse environmental impacts on any air, water, soil, or wildlife resources resulting from oil and gas operations and to protect and minimize adverse impacts to public health, safety, welfare, the environment and wildlife resources.

30. Rule 902.c. requires operators to prevent the unauthorized discharge or disposal of oil, condensate, gas, E&P Waste, chemical substances, trash, discarded equipment, and other oil field waste.

31. The Release resulted in vaporized hydrocarbon mists that left the Location and impacted off-location properties. Doc. No. 404156194. The Form 27 Initial Site Investigation and Remediation Plan states that the Release involved a discharge of E&P Waste, oil, and condensate, produced water, drilling fluids, pigging waste⁷, and other E&P Waste which impacted or threatened to impact, water, soil, and vegetation. Doc. No.

⁷ Pigging waste was reported on the Form 27 Initial in error. Form 27 Supplementals reported "Workover Fluids" instead.

404175397. Sampling and analyses conducted during and after the Release indicates that the Release resulted in impacts or threatened impacts to Waters of the State, soil, and vegetation. *Id.*

32. The NOAV alleges that Noble violated Rules 902.a.-.c. because it failed to prevent pollution and adverse environmental impacts on air, water, soil, or wildlife resources resulting from oil and gas operations and failed to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources, and prevent the unauthorized discharge of E&P Waste and chemical substances in connection with the Release.

Rule 902.d.

33. Rule 902.d. prohibits operators from violating numeric or narrative water quality standards or classifications established by the Water Quality Control Commission for Waters of the State in the conduct of any oil and gas operations.

34. The Form 19 Initial Spill/Release Report reported the presence of free product or hydrocarbon sheen on surface water and the presence of contaminated soil in contact with surface water. Doc. No. 404156194. Surface water sampling and analysis of Willow Creek detected constituents of the Release in Willow Creek, which is a Water of the State.

35. The NOAV alleges that Noble violated Rule 902.d. because the Release caused exceedances of numeric or narrative water quality standards or classifications established by the Water Quality Control Commission for Waters of the State.

Rule 602.c.

36. Rule 602.c. requires operators to ensure that operations are conducted with due regard for the safety of employees, for the preservation of property, and for protecting and minimizing adverse impacts to public health, safety, welfare, the environment, and wildlife resources.

37. As Noble reported in the Form 22 Accident Report Update, the Release resulted in an employee of one contractor sustaining a leg fracture. Doc. No. 404234441. Staff also identified adverse environmental impacts (*see* ¶ 6, *supra*).

38. The NOAV alleges that Noble violated Rule 602.c. because it failed to conduct operations with due regard for the safety of employees, for the preservation of property, and for protecting and minimizing adverse impacts to public health, safety, welfare, the environment, and wildlife resources during the Release.

Rule 608.e.

39. Rule 608.e. requires operators to keep all production facilities, valves, pipe fittings, and vessels securely fastened or sealed, inspected at regular intervals, and

maintained in good mechanical condition, and that all equipment will be engineered, operated, and maintained within the manufacturer's recommended specifications.

40. As Noble reported in the Form 22 Accident Report Update, the root cause of the Release was the improper assembly and setting of certain equipment at the Well. Doc. No. 404234441.

41. The NOAV alleges that Noble violated Rule 608.e. because it failed to keep all production facilities, valves, pipe fittings, and vessels securely fastened or sealed, inspected at regular intervals, and maintained in good mechanical condition and failed to operate and engineer equipment within the manufacturer's recommended specifications in connection with the Release.

Rule 903

42. Rule 903 prohibits the venting and flaring of natural gas, except for certain enumerated regulatory exceptions.

43. Pursuant to the 100-Series definition, venting occurs when natural gas is allowed to escape into the atmosphere but does not include unintentional leaks that are not the result of inadequate equipment design.

44. Noble's Form 19 Initial reported that vaporized hydrocarbon mists left the Location. Doc. No. 404156194.

45. The NOAV alleges that Noble violated Rule 903 because natural gas was vented to the atmosphere during the Release.

Condition of Approval – C.R.S. § 34-60-121

46. Pursuant to C.R.S. § 34-60-121(1)(a) of the Energy and Carbon Management Act, any operator that violates an ECMC order or permit condition of approval ("COA") is subject to a penalty of not more than \$15,000 for each act of violation per day that such violation continues.

47. Noble collected soil samples from the Galeton Elementary School grounds on May 3 and 4, 2025.

48. On May 29, 2025, ECMC Enforcement Staff applied a COA to Noble's Form 27 Initial that required Noble to submit laboratory analytical results within seven days of receiving the final analytical results from the laboratory for all samples. Doc. No. 404191253.

49. On July 9, 2025, Noble received the final validated results for the soil samples collected on May 3 and 4, 2025.

50. On August 6, 2025, more than seven days after receiving the results, Noble submitted the final validated soil sampling results that it received on July 9, 2025, to ECMC in a Form 27 Supplemental. Doc. No. 404307080.

51. Although the NOAV did not allege a violation of a COA, for purposes of settlement and in the interests of administrative efficiency, ECMC Enforcement Staff and Noble (“Parties”) have agreed to a COA violation related to submittal of the final validated results for the May 3 and 4, 2025 sampling.

Penalty Calculation

52. Following a factual investigation and legal review of the violations alleged in the NOAV described above, ECMC Enforcement Staff asserts Noble has failed to comply with Rules 428.a., 902.a.-c., 902.d., 602.c., 608.e., 903, and C.R.S. § 34-60-121 as described in the table below.

NOAV No.	Facility	Rule	Rule Class	Adverse Impact	Daily Base Penalty	Start Date	End Date	Days of Violation	Total Penalty
404 256 913	Bishop A18- 742 (API # 123- 52071)	428.a.	3	Major	\$15,000	4/6/2025	4/11/2025	6	\$90,000
		902.a.	3	Major	\$15,000	4/6/2025	4/25/2025	20	\$300,000
		902.b.	3	Major	\$15,000	4/6/2025	4/25/2025	20	\$300,000
		902.c.	3	Major	\$15,000	4/6/2025	4/25/2025	20	\$300,000
		902.d.	3	Major	\$15,000	4/6/2025	4/25/2025	20	\$300,000
		602.c.	3	Major	\$15,000	4/6/2025	4/6/2025	1	\$15,000
		608.e.	2	Major	\$10,000	4/6/2025	4/6/2025	1	\$10,000
		903	3	Major	\$15,000	4/6/2025	4/10/2025	5	\$75,000
		COA	2	Major	\$15,000*	7/17/2025	8/6/2025	21	\$315,000
Subtotal									\$1,705,000
Settlement Discount (10%)									\$170,500
Total Penalty									\$1,534,500

*Although the standard base penalty for a Class 2, Major violation is \$10,000, in the interest of settlement, the Parties agreed to increase the daily base penalty to the statutory maximum of \$15,000.

53. Pursuant to Rule 525 and the Commission’s Enforcement Guidance and Penalty Policy, ECMC Enforcement Staff calculated a penalty of \$1,534,500 for these violations. The penalty calculation is based on ECMC Enforcement Staff’s Findings that:

a. Rule 428.a.

- i. An initial start date of April 6, 2025, the date the Release occurred. An end date of April 11, 2025, the date the Well was declared secured and under control;
- ii. The Commission classifies Rule 428.a. as a Class 3 violation;
- iii. Major impact given the actual, significant adverse impacts that resulted from the Release; and
- iv. Daily base penalty of \$15,000.

b. Rule 902

- i. All counts of Rule 902 have a start date of April 6, 2025, the date the Release occurred, and an end date of April 25, 2025, the date the Form 27 Initial was submitted, which was the day Noble commenced corrective action to the ECMC Director's satisfaction;
- ii. The Commission classifies Rule 902 as a Class 3 violation;
- iii. Major impact given the actual, significant adverse impacts that resulted from the Release; and
- iv. Daily base penalty of \$15,000 per violation.

c. Rule 602.c.

- i. An initial start date of April 6, 2025, the date the designed well barriers failed and a loss of control over the pressure within the wellbore occurred at the Well, and an end date of April 6, 2025, the date Noble evacuated personnel from the pad site.
- ii. The Commission classifies Rule 602.c. as a Class 3 violation;
- iii. Major impact given the actual, significant adverse impacts that resulted from the Release; and
- iv. Daily base penalty of \$15,000.

d. Rule 608.e.

- i. An initial start date of April 6, 2025, the date the designed well barriers failed and a loss of control over the pressure within the wellbore occurred at the Well, and an end date of April 6, 2025, the date of the Release;
- ii. The equipment in question was ejected out of the wellbore and once that happened this violation was no longer correctable;
- iii. The Commission classifies Rule 608.e. as a Class 2 violation;
- iv. Major impact given the actual, significant adverse impacts that resulted from the Release; and
- v. Daily base penalty of \$10,000.

e. Rule 903

- i. An initial start date of April 6, 2025, the date the Release occurred, and an end date of April 10, 2025, the date the venting stopped;
- ii. The Commission classifies Rule 903 as a Class 3 violation;
- iii. Major impact given the actual, significant adverse impacts that resulted from the Release; and
- iv. Daily base penalty of \$15,000.

f. COA

- i. An initial start date of July 17, 2025, which is eight days after Noble received the validated analytical results for the soil sampling conducted on May 3, 2025, and May 4, 2025, at the Galeton Elementary School, and an end date of August 6, 2025, the day Noble submitted the results to ECMC on a Form 27;
- ii. The Commission classifies a COA violation as a Class 2 violation;
- iii. Major impact given the actual, significant adverse impacts that resulted from the Release; and
- iv. Daily base penalty of \$15,000. Although the standard base penalty for a Class 2, Major violation is \$10,000, in the interest of settlement, the Parties agreed to increase the daily base penalty to the statutory maximum of \$15,000.

g. No aggravating or mitigating factors.

h. ECMC Enforcement Staff exercised its discretion and did not apply the Duration Matrix to the penalty calculation.

i. A 10% reduction as an inducement for settlement and to reflect the avoided costs and administrative burdens that would result from adjudicating this matter.

AGREEMENT

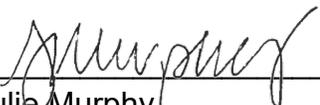
WHEREAS, Noble agrees to this Administrative Order by Consent only for the purpose of expeditiously resolving the matter without a contested hearing, which is deemed beneficial to both Parties. Noble reserves the right to contest the Findings in any proceeding before any agency, court, or other tribunal, except in a proceeding to enforce the terms of this Administrative Order by Consent. The Findings and action undertaken by Noble pursuant to this Administrative Order by Consent shall not constitute evidence of fault or liability by Noble with respect to any third-party claim against Noble.

WHEREAS, pursuant to Rule 525.f., in its discretion, the Commission may allow an operator to satisfy a penalty in whole or in part by a Public Project that the operator is not otherwise legally required to undertake. In partial satisfaction of the penalty amount, Noble and the Director have agreed that Noble may fund multiple Public Projects, described below.

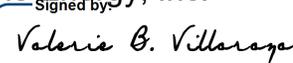
NOW, THEREFORE, based on the Findings and pursuant to Rule 523.d. and the Commission's Enforcement Guidance and Penalty Policy, the ECMC Director proposes and Noble requests that the Commission approve the Order set forth below.

RECOMMENDED this __ day of February 2026.

ENERGY AND CARBON MANAGEMENT
COMMISSION OF THE STATE OF COLORADO

By 
Julie Murphy
Director

AGREED TO AND ACCEPTED THIS __^{20th} day of February 2026.

By 
Noble Energy, Inc.
Signature of Authorized Company Representative

Valerie B. Villaraza
Print Signatory Name

Assistant Secretary
Title

ORDER

HAVING CONSIDERED the Findings detailed above, the COMMISSION ORDERS:

1. Noble is found in violation of Commission Rule(s) 428.a., 902.a.-c., 902.d., 602.c., 608.e, 903 and C.R.S. § 34-60-121, as described above.
2. Noble is assessed a penalty of \$1,534,500.
 - a. Noble shall pay \$500,000 of the assessed penalty via certified check within 30 days after the final Order in this matter is transmitted by the Commission.
 - b. In satisfaction of up to \$1,034,500 of the assessed penalty and in lieu of paying that amount to the Commission, Noble may fund one or more public projects as outlined below (“Public Projects”) or as mutually agreed to by the Parties. The Public Projects must be funded on or before August 31, 2026.
3. The Public Projects below constitute qualifying “public projects” as defined in Rule 525.f. because they benefit public health, safety, welfare, the environment, or wildlife resources and, except for those responsibilities set forth below in this Order, Noble has no pre-existing legal obligations with respect to the Public Projects. The Public Projects described below are in settlement of the violations found herein, are to be directly funded by Noble, and do not constitute publicly-funded contracts. Certain costs below are estimates. Noble will only be responsible for Public Project costs in the amount of \$1,034,500. Should actual costs exceed that amount, Noble will not be responsible for the excess amount. Should actual costs be lower than that amount, Noble will pay the difference between the costs incurred and \$1,034,500 by certified check by September 30, 2026.
4. The Public Projects consist of:
 - a. Payment to Tetra Tech, Inc., ECMC’s contractor, for up to \$100,000 subject to the following terms:
 - i. The funding provided to Tetra Tech, Inc. will be used to pay for Tetra Tech Inc’s management, tracking, field oversight, GIS support, sampling support, report reviews, and project coordination related to the Release.
 - b. Payment to a third-party contractor identified by ECMC Enforcement Staff (“Contractor A”) of up to \$584,500 subject to the following terms:
 - i. The funding provided to Contractor A will be used to pay for Contractor A’s work reviewing and helping to process Forms 27 to reduce the backlog of Forms 27 that has resulted from the Release.

- c. Payment to a third-party contractor identified by ECMC Enforcement Staff (“Contractor B”) of up to \$200,000 subject to the following terms:
 - i. The funding provided to Contractor B will be used to pay for a systematic review of well records in COGIS, for wells plugged prior to January 1, 2008, looking for indications that these wells needs further engineering evaluation.
- d. Payment to Forensic Discovery, ECMC’s contractor, for up to \$150,000 subject to the following terms:
 - i. The funding provided to Forensic Discovery will be used to pay for a review of 3,400 lab reports submitted to ECMC by several different operators between January 1, 2020, and July 1, 2025, attached to Forms 27 that requested No Further Action, which were approved, looking for data anomalies.

5. ECMC will update Noble on the Public Projects work status and costs incurred at least quarterly. Upon Noble’s request, ECMC will provide Noble with invoices documenting the fees billed for time and materials by each contractor and, before Noble is required to pay such fees, documentation demonstrating that ECMC approved or is otherwise satisfied with the contractor’s work.

6. In addition to the penalty payment described above, Noble will submit no fewer than 100 No Further Action Forms 27, by April 1, 2026, and a second batch of no fewer than 100 by June 1, 2026, regarding remediation of the Release.

7. Failure to pay the penalty by the above deadline is an independent violation that may be subject to additional penalties.

8. Compliance dates specified in this Order may be extended only for good cause, as determined at the Director’s sole discretion. A request for extension must be made, in writing, at least 30 days prior to the pertinent deadline, or as soon as possible if 30 days prior notice is not feasible. Failure to receive an extension prior to the compliance deadline or the failure to meet a compliance deadline may constitute a new violation subject to additional penalties.

9. This Order is effective as of the date it is transmitted by the Commission. It constitutes final agency action for purposes of judicial review.

10. The Commission expressly reserves its right after notice and hearing, to alter, amend, or repeal and/or all of the above Order.