

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
401382194  
Receive Date:  
08/21/2017

Report taken by:  
BOB CHESSON

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 COGCC 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATON

Name of Operator: NOBLE ENERGY INC	Operator No: 100322	<b>Phone Numbers</b>
Address: 1625 BROADWAY STE 2200		Phone: (970) 3045329
City: DENVER State: CO Zip: 80202		Mobile: ( )
Contact Person: Jacob Evans	Email: jacob.evans@nblenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 8244 Initial Form 27 Document #: 2147872

PURPOSE INFORMATION

- 901.e. Sensitive Area Determination
- 909.c.(1), Rule 905: Pit or PW vessel closure
- 909.c.(2), Rule 906: Spill/Release Remediation
- 909.c.(3), Rule 907.e.: Land treatment of oily waste
- 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure
- 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
- Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
- Rule 909.e.(2)B.: Closure of remediation project
- Rule 906.c.: Director request
- Other

SITE INFORMATION

N Multiple Facilites ( in accordance with Rule 909.c. )

Facility Type: LOCATION	Facility ID: 320740	API #:	County Name: ARAPAHOE
Facility Name: OAKLAND CATTLE CO. 32-27-65S61W 27SWNE		Latitude: 39.588810	Longitude: -104.200150
QtrQtr: SWNE Sec: 27 Twp: 5S		Range: 61W	Meridian: 6 Sensitive Area? Yes
** correct Lat/Long if needed: Latitude: Longitude:			

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use CROP 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

SURFACE WATER 544' E.

# 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 type="checkbox"/> Oil                       | <input type="checkbox"/> Tank Bottoms                |  |
| <input type="checkbox"/> Condensate                | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> Other (as described by EPA) | _____                                  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	25' X 25'	Lab analytical
Yes	SOILS	45' E-W X 105' N-S X 32' DEEP	Lab Analytical

## INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

During plugging and abandonment of the facility impacted soil above COGCC Table 910-1 standards was discovered. See COGCC Document #2147475.

## 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 ):

Sixty three (63) soil samples were collected during excavation and site assessment activities and analyzed by a certified laboratory for TPH-DRO, TPH-GRO, BTEX, and Naphthalene by EPA Methods 8260b and 8015.

### Proposed Groundwater Sampling

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

Six (6) groundwater samples were collected during excavation and site assessment activities and analyzed by a certified laboratory for BTEX by EPA Method 8260b.

### 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 ):

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 63  
Number of soil samples exceeding 910-1 10  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 10530

### NA / ND

-- Highest concentration of TPH (mg/kg) 3200  
NA Highest concentration of SAR           
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 33

### Groundwater

Number of groundwater samples collected 6  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 34'  
Number of groundwater monitoring wells installed 5  
Number of groundwater samples exceeding 910-1 1

-- Highest concentration of Benzene (µg/l) 58  
-- Highest concentration of Toluene (µg/l) 38  
-- Highest concentration of Ethylbenzene (µg/l) 270  
-- Highest concentration of Xylene (µg/l) 1700  
NA Highest concentration of Methane (mg/l)         

### Surface Water

0 Number of surface water samples collected  
0 Number of surface water samples exceeding 910-1  
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?

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?

# 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.

Impacted soil above COGCC Table 910-1 standards was removed via excavation.

## **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.

Impacted soil above COGCC Table 910-1 standards was removed and treated ex situ using a soil shredder and hydrogen peroxide. Treated soil and sidewall confirmation soil samples were collected and submitted to a certified lab to ensure compliance with the COGCC Table 910-1 standards prior to utilizing the treated soil as backfill material.

## **Soil Remediation Summary**

In Situ

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

Ex Situ

Yes \_\_\_\_\_ Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 763  
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
Yes \_\_\_\_\_ Excavate and onsite remediation  
No \_\_\_\_\_ Land Treatment  
No \_\_\_\_\_ Bioremediation (or enhanced bioremediation)  
Yes \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Other \_\_\_\_\_

## **Groundwater Remediation Summary**

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
No \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Air sparge / Soil vapor extraction  
Yes \_\_\_\_\_ Natural Attenuation  
No \_\_\_\_\_ 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.

Five (5) groundwater monitoring wells were installed and point of compliance has been achieved. Groundwater monitoring on a quarterly basis will be conducted until four consecutive quarters of compliant BTEX is achieved.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

Frequency:  Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

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

Other No Further Action Request \_\_\_\_\_

### 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:

Yes, impacted soil treated with hydrogen peroxide was used as backfill upon confirmation soil analytical.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 5995

E&P waste (solid) description Impacted soil above COGCC Table  
910-1 standards \_\_\_\_\_

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

Non-COGCC Disposal Facility: Buffalo Ridge Landfill \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 0

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

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

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes \_\_\_\_\_

Do all soils meet Table 910-1 standards? Yes \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? No \_\_\_\_\_

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? Yes \_\_\_\_\_

Is additional groundwater monitoring to be conducted? No \_\_\_\_\_

## 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.

THE EXCAVATION WILL BE FILLED WITH TREATED SOIL AND GRADED TO MATCH THE ADJACENT TOPOGRAPHY. RECLAMATION ACTIVITIES AT THE SITE WILL BE COMPLIANT WITH COGCC REGULATIONS.

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 approve the seed mix? \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, if known. 01/15/2014

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). \_\_\_\_\_

Date of commencement of Site Investigation. 01/15/2014

Date of completion of Site Investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 01/15/2014

Date of completion of Remediation. \_\_\_\_\_

### SITE RECLAMATION DATES

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

### OPERATOR COMMENT

No Further Action Request Oakland Cattle Company 32-27 2

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

Signed: Jacob Evans

Title: Environmental Coordinator

Submit Date: 08/21/2017

Email: jacob.evans@nblenergy.com

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

COGCC Approved: BOB CHESSON

Date: 08/22/2017

Remediation Project Number: 8244

### COA Type

### Description

<u>COA Type</u>	<u>Description</u>

### Attachment Check 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

401382194	FORM 27-SUPPLEMENTAL-SUBMITTED
401382196	MONITORING REPORT

Total Attach: 2 Files

### General Comments

#### User Group

#### Comment

#### Comment Date

Environmental	The COGCC has reviewed the NFA request for Project/Remediation #8244. Based on the information presented no further action is necessary at this time. However, should future conditions at the site indicate contaminant concentrations in soils or groundwater exceeding COGCC standards then further investigation and/or remediation activities may be required at the site. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.	08/22/2017
---------------	--	------------

Total: 1 comment(s)