

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Candice (Nikki) Graber

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 INFORMATION

Name of Operator: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers Phone: (970) 3045329 Mobile: ()
Address: 1001 NOBLE ENERGY WAY		
City: HOUSTON State: TX Zip: 77070		
Contact Person: Jacob Evans	Email: jacob.evans@nblenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11603

Initial Form 27 Document #: 401710258

PURPOSE INFORMATION

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

SITE INFORMATION

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

Facility Type: SPILL OR RELEASE	Facility ID: 455230	API #: _____	County Name: WELD
Facility Name: Bierig 1-26	Latitude: 40.373436	Longitude: -104.742267	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 26	Twp: 5N	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Non-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? Yes

Other Potential Receptors within 1/4 mile

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
Yes	GROUNDWATER	TBD	Laboratory Analysis
Yes	SOILS	TBD	Laboratory Analysis

INITIAL ACTION SUMMARY

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

Impacted soil above COGCC Table 910-1 standards was discovered during plugging and abandonment procedures. Excavation of impacted soil will be scheduled.

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):

Thirty two soil samples were collected during site investigation activities and analyzed for TPH-DRO, TPH-GRO, BTEX, and Naphthalene by EPA Methods 8015 and 8260b.

Proposed Groundwater Sampling

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

Eight groundwater samples were collected and analyzed 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):

A groundwater site assesement will be scheduled to delineate dissolved phase impacts.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 32

Number of soil samples exceeding 910-1 5

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 1200

NA / ND

-- Highest concentration of TPH (mg/kg) 11600

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 8

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 10'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 6

-- Highest concentration of Benzene (µg/l) 5200

-- Highest concentration of Toluene (µg/l) 4700

-- Highest concentration of Ethylbenzene (µg/l) 1100

-- Highest concentration of Xylene (µg/l) 13000

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

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.

Approximately 10,250 cu/yds of impacted soil was treated by mixing hydrogen peroxide into the soil and 7,400 cu/yds of impacted soil was removed from the location and disposed of at a certified landfill. Confirmation soil samples were collected above the phreatic zone from the excavation base and sidewalls to determine the lateral and vertical extents of impacts.

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.

Once the proposed monitoring well placement locations are approved, monitoring wells will be installed to assess if there is any remaining residual absorbed impacts, delineate dissolved phase impacts, and achieve point of compliance. Additional monitoring wells may be installed once initial laboratory analytical is received to achieve point of compliance. This environmental assessment will be scheduled prior to September 15, 2019 pending COGCC and landowner approval.

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) _____ 7400

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)

Yes _____ 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.

Post excavation monitoring wells will be installed to determine the extent of dissolved phase impacts.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report
☐ Other _____

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:

Impacted soil was treated via chemical oxidation and utilized to backfill the excavation once laboratory analytical confirmed it was below COGCC Table 910-1 standards. A total of 10,250 cu/yds were treated.

Volume of E&P Waste (solid) in cubic yards 17650

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/Ault Landfills

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? No _____

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? No _____

Is additional groundwater monitoring to be conducted? Yes _____

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 COGCC 1000 series rules.

Is the described reclamation complete? No _____

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. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/18/2018

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. 05/18/2018

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/22/2018

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. 04/05/2019

Date of completion of Reclamation. _____

OPERATOR COMMENT

The area between and in the vicinity of TP26 and W02 was treated with hydrogen peroxide during soil mixing activities, soil mixing ceased and desorption may have occurred and migrated causing additional impacts above COGCC standards. The area was excavated, confirmation soils samples were collected by APEX, and soil borings will be installed to ensure soil is below COGCC Table 910-1 standards. COA documents are attached per form 27 document number 402056202.

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: ` 07/25/2019

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: Candice (Nikki) Graber

Date: 07/30/2019

Remediation Project Number: 11603

COA Type**Description**

	The Operator shall conduct proposed remedial activities in accordance with this approved workplan and Rules 909. and 910 within 45 days. A subsequent Form 27 shall be submitted within 45 days of work being completed. An extension of the 45 day deadline may be considered due to access restrictions.
	Operator shall provide boring logs (for both soil borings and monitoring wells) in accordance with standard environmental practices. This includes at a minimum; lithology description, USCS classifications, PID readings, sample collection depths, depth to water, and well construction. Soil samples shall be collected from both soil borings and monitoring wells. Confirmation soil samples should be collected and analyzed in accordance with Rule 910.
	Operator shall notify COGCC EPS personnel no less than 72 hours prior to conducting site investigation.

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**

402121511	FORM 27-SUPPLEMENTAL-SUBMITTED
402121520	OTHER
402121524	SITE INVESTIGATION PLAN
402121527	OTHER

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)