

State of Colorado  
Oil and Gas Conservation Commission

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01/12/2022  
Report taken by:  
RICK ALLISON

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: NOBLE MIDSTREAM SERVICES LLC	Operator No: 10686	Phone Numbers Phone: (970) 3045329 Mobile: ( )
Address: 1625 BROADWAY #2200		
City: DENVER State: CO Zip: 80202		
Contact Person: Jacob Evans	Email: jacob.evans@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20790 Initial Form 27 Document #: 402857158

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: SPILL OR RELEASE	Facility ID: 480529	API #: _____	County Name: WELD
Facility Name: Harper Kona Pipeline	Latitude: 40.468274	Longitude: -104.556754	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 21	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Pasture/Rangeland  
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

Occupied building 1020'

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X 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

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Rows include GROUNDWATER and SOILS.

INITIAL ACTION SUMMARY

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

A release from the Harper Kona Pipeline was discovered after fluid daylighted to the ground surface. Initial actions included isolating the pipeline, placing absorbent socks, and vacuuming standing liquids. Excavation of impacted material began on August 17, 2021.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

X Will soil samples be collected as part of this investigation? ( Number, type (grab/composite), analyses, and locations of samples ):

One hundred and twenty-two (122) Soil samples were collected for analysis of all Table 915-1 contaminants of concern.

Proposed Groundwater Sampling

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

Two grab groundwater samples were collected and analyzed for BTEX, naphthalene, 1,2,3-trimethylbenzene, and 1,2,4-trimethylbenzene.

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 122  
Number of soil samples exceeding 915-1 122  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 60000

**NA / ND**

-- Highest concentration of TPH (mg/kg) 510  
-- Highest concentration of SAR 4.97  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 14

**Groundwater**

Number of groundwater samples collected 2  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 14'  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 8.9  
-- Highest concentration of Toluene (µg/l) 81  
-- Highest concentration of Ethylbenzene (µg/l) 13  
-- Highest concentration of Xylene (µg/l) 150  
NA 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?

Impacts occurred off the ROW in adjacent properties.

Were background samples collected as part of this site investigation?

Background samples were collected for inorganics 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?

\_\_\_\_\_

**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.

The source was removed through excavation of impacted soil. Confirmation samples were collected for the full Table 915-1 suite of contaminants of concern.

**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.

Source material was removed via excavation. A groundwater site assessment was completed to delineate impacted groundwater. A sample of produced water was collected at the Harper/Kona facility to compare concentrations of total recoverable metals in the produced water to Table 915-1 metal concentrations in the excavation confirmation soil samples. Fremont Environmental calculated that the amount of produced water released did not have enough volume to account for the elevated arsenic found in the excavated soil (see attached report for further discussion). Groundwater will be monitored for natural attenuation on a quarterly basis. Based on current groundwater analytical a no further action may be requested in July 2022 if four consecutive quarters of compliant groundwater is achieved.

**Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation ) \_\_\_\_\_ Yes \_\_\_\_\_ Excavate and offsite disposal

Chemical oxidation  
 Air sparge / Soil vapor extraction  
 Natural Attenuation  
 Other \_\_\_\_\_

If Yes: Estimated Volume (Cubic Yards) 10738  
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
 Excavate and onsite remediation  
 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.

Ten groundwater monitoring wells were installed. Groundwater samples will be collected for analysis of BTEX, naphthalene, 1,3,5-trimethylbenzene, and 1,2,4-trimethylbenzene, inorganic parameters, and dissolved barium.

# 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 \_\_\_\_\_

## 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:

Volume of E&P Waste (solid) in cubic yards 10738

E&P waste (solid) description E&P solid waste derived from excavation activities

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

Non-COGCC Disposal Facility: Waste Management

Volume of E&P Waste (liquid) in barrels 421

E&P waste (liquid) description Liquid E&P waste recovered from the source release area

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

Non-COGCC Disposal Facility: NGL

# 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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

Operator shall comply with the COGCC 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 COGCC 1000 Series Rules. A detailed reclamation plan will be submitted to account for concentrations of inorganics in soil.

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 provide the seed mix? Yes \_\_\_\_\_

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

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

## SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/01/2021

Proposed date of completion of Reclamation. \_\_\_\_\_

## 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. 08/16/2021

Actual Spill or Release date, or date of discovery. 08/16/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/16/2021

Proposed site investigation commencement. 08/16/2021

Proposed completion of site investigation. 11/15/2021

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/17/2021

Proposed date of completion of Remediation. 07/29/2022

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:

**OPERATOR COMMENT**

Corrected total cubic yards removed/excavated to 10738 cu/yds

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 Specialist \_\_\_\_\_

Submit Date: ` 01/12/2022 \_\_\_\_\_

Email: jacob.evans@chevron.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: RICK ALLISON \_\_\_\_\_

Date: 01/20/2022 \_\_\_\_\_

Remediation Project Number: 20790 \_\_\_\_\_

**Condition of Approval****COA Type****Description**

0 COA	
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**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**

402924430	FORM 27-SUPPLEMENTAL-SUBMITTED
402924606	MONITORING REPORT

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)