

# State of Colorado Oil and Gas Conservation Commission

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Receive Date:

12/31/2022

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.

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

### OPERATOR INFORMATION

|                                     |                             |                       |
|-------------------------------------|-----------------------------|-----------------------|
| Name of Operator: NOBLE ENERGY INC  | Operator No: 100322         | <b>Phone Numbers</b>  |
| Address: 2001 16TH STREET SUITE 900 |                             | Phone: (715) 562-0251 |
| City: DENVER                        | State: CO Zip: 80202        | Mobile: ( )           |
| Contact Person: Dan Peterson        | Email: rbueuf27@chevron.com |                       |

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 12461 Initial Form 27 Document #: 401935242

#### 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: 459804 | API #: _____           | County Name: WELD                         |
| Facility Name: Duncan D20-                     | Latitude: 40.210677 | Longitude: -104.584405 |   |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |   |
| QtrQtr: NWSW                                   | Sec: 20             | Twp: 3N                | Range: 6W Meridian: 6 Sensitive Area? Yes |

#### SITE CONDITIONS

General soil type - USCS Classifications SW 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

## 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    | 20' X 20'         | Laboratory Analysis |
| Yes       | SOILS          | 20' X 20' X 5'bgs | 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.

Subsequent to tank battery dismantlement, impacted media was discovered near the produced water vessel. A limited excavation was conducted and 50 cubic yards was removed under signed waste manifest and transported to Buffalo Ridge Landfill. Tasman Geosciences was on location to collect soil samples for site investigation purposes. Four grab sidewall samples were collected above the phreatic zone and analyzed for TPH-DRO, TPH-GRO, BTEX, and Naphthalene. One grab groundwater sample was collected from the base of the excavation and analyzed for BTEX. All samples were transported to Summit Scientific under proper chain of custody procedures. Further excavation 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 ):

Four grab soil samples were collected above the phreatic zone and analyzed for TPH-DRO, TPH-GRO, BTEX, and Naphthalene by EPA Methods 8015 and 8260B. Additionally, SS04@3' was analyzed for SAR, EC, and pH by laboratory methods Soluble Nutrients by EPA 6020 6(2,3A) - Dry Weight Basis, Specific Conductance by EPA Method 120.1, and Physical Parameters by APHA/ASTM/EPA Methods.

#### Proposed Groundwater Sampling

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

One grab groundwater sample was collected at the base of the excavation 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 ):

## SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 4

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 400

### NA / ND

-- Highest concentration of TPH (mg/kg) 10700

-- Highest concentration of SAR 4.01

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 5

### Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 5

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 970

-- Highest concentration of Toluene (µg/l) 3.2

-- Highest concentration of Ethylbenzene (µg/l) 560

-- Highest concentration of Xylene (µg/l) 3800

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?

☐ 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.

The source was removed through excavation of impacted soil on June 6, 2019. Grab confirmation soil samples were collected by Tasman Geosciences above the phreatic zone.

## 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.

Eight groundwater monitoring wells were installed to delineate dissolved phase impacts and will be sampled on a quarterly basis. Impacted soil remains at the site in the saturation zone. Point of compliance has been achieved. A solar powered AS/SVE remediation system is currently operational.

## 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) 120

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

☐ No ☐ Excavate and onsite remediation

☐ Land Treatment

☐ Bioremediation (or enhanced bioremediation)

☐ Chemical oxidation

☐ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

☐ No ☐ Bioremediation ( or enhanced bioremediation )

☐ No ☐ Chemical oxidation

☐ Yes ☐ Air sparge / Soil vapor extraction

☐ Yes ☐ Natural Attenuation

☐ Yes ☐ Other 55lbs of activated carbon was  
applied to the base of the  
excavation \_\_\_\_\_

### **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.

Eight groundwater monitoring wells were installed and will be sampled on a quarterly basis. Groundwater samples will be sent under standard chain of custody procedures for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene, and chlorides.

## 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

### 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 (policy MWZZ 316714) and financial assurance in compliance with COGCC rules. Records are available on the COGCC'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 120

E&P waste (solid) description Impacted soil above COGCC Table 910-1 standards derived from excavation work.

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Buffalo Ridge Landfill/Waste Management

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

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? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? No \_\_\_\_\_

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

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 1004 Rule.

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? \_\_\_\_\_

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

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

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/06/2019

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. 08/01/2019

Actual Spill or Release date, or date of discovery. 12/10/2018

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/10/2018

Proposed site investigation commencement. 10/10/2018

Proposed completion of site investigation. 08/21/2019

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/21/2019

Proposed date of completion of Remediation. 01/31/2024

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**

|  |
|--|
|  |
|--|

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

Signed: Allan Engelhardt

Title: Environmental Consultant

Submit Date: 12/31/2022

Email: chevroneform@tasman-geo.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: 01/03/2023

Remediation Project Number: 12461

**COA Type****Description**

|       |  |
|-------|--|
|       |  |
| 0 COA |  |

**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**

|           |                                |
|-----------|--------------------------------|
| 403276609 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403276617 | OTHER                          |

Total Attach: 2 Files

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

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)