

State of Colorado Energy & Carbon Management Commission

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



Document Number:

403474752

Receive Date:

07/24/2023

Report taken by:

Alexander Ahmadian

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	Phone Numbers Phone: (715) 562-0251 Mobile: ()
Address: 2001 16TH STREET SUITE 900		
City: DENVER	State: CO Zip: 80202	
Contact Person: Dan Peterson	Email: rbueuf27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 8952 Initial Form 27 Document #: 2314239

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: 437104	API #: _____	County Name: WELD
Facility Name: SPILL/RELEASE POINT		Latitude: 40.289953	Longitude: -104.755675
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: NENE	Sec: 27	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? Yes

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? Yes

Other Potential Receptors within 1/4 mile

Irrigation well 0.13 mi south-southwest, domestic water wells 0.06 mi NE, 0.15 mi NE, & 0.22 mi NE

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	See attached figure	Laboratory Analytical
Yes	SOILS	50' N-S x 70' E-W x15' total depth	Excavation soil sample results

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 historical release was discovered during removal of a water vault at Lorenz UPRR 41-27 1, 3. The production equipment has been shut in. Please refer to Form 19 submitted May 6, 2014 (document # 400611726).

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):

Twenty soil samples were collected and analytzed for TPH-DRO, TPH-GRO, BTEX, and Naphthalene by a certified laboratory.

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, Naphthalene, 1,2,4-trimethylbenzene, 1,3,5 trimethylbenzene, chloride, sulfate, and TDS by a certified laboratory.

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 20

Number of soil samples exceeding 915-1 5

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 3500

Groundwater

Number of groundwater samples collected 272

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 12

Number of groundwater monitoring wells installed 13

Number of groundwater samples exceeding 915-1 48

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.

NA / ND

-- Highest concentration of TPH (mg/kg) 5682

NA Highest concentration of SAR

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 15

-- Highest concentration of Benzene (µg/l) 33000

-- Highest concentration of Toluene (µg/l) 6740

-- Highest concentration of Ethylbenzene (µg/l) 1300

-- Highest concentration of Xylene (µg/l) 35000

NA Highest concentration of Methane (mg/l)

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 2,530 cubic yards of impacted soil was excavated. Confirmation soil samples indicate that impacted soil in exceedance of the applicable Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 standards was removed via excavation activities.

REMEDIAL 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.

NFA will be requested once four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915 constituents below regulatory limits. As needed, soil and/or groundwater remediation plans will be developed and submitted to COGCC in a supplemental Form 27.

Soil Remediation Summary☒ In Situ

No Bioremediation (or enhanced bioremediation)

No Chemical oxidation

☒ Ex Situ

Yes Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) 2530

Yes Air sparge / Soil vapor extraction

Yes Natural Attenuation

No Other _____

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

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.

Groundwater will be sampled on a quarterly basis until analytical results are reported with concentrations Table 915-1 analytes below regulatory limits for four consecutive quarters. Eight monitoring wells (MW-1, MW-5 through MW-9, MW-12, and MW-13) are sampled on a quarterly basis to monitor natural attenuation. Groundwater monitoring wells were sampled and submitted to a laboratory for analysis of Table 915-1 groundwater constituents: Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene. Noble proposes to discontinue sampling for Chloride ion, Sulfate ion and Total Dissolved Solids (TDS) since more than four consecutive unimpacted quarters have been achieved for these inorganic constituents.

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 reuse

Volume of E&P Waste (solid) in cubic yards 2530

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? 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? No

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.

The excavation was backfilled with clean fill to re-establish the pre-existing grade. Reclamation will be compliant with the COGCC Reclamation Rule 1004-Final Reclamation of Well Sites and Associated Production Facilities.

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. 05/22/2014

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. 08/01/2014

Actual Spill or Release date, or date of discovery. 05/06/2014

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/29/2015

Proposed site investigation commencement. 05/22/2014

Proposed completion of site investigation. 05/22/2014

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/29/2014

Proposed date of completion of Remediation. 12/31/2026

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: Ethan Black

Title: Consultant

Submit Date: 07/24/2023

Email: ethanb@fremontenv.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: Alexander Ahmadian

Date: 08/22/2023

Remediation Project Number: 8952

COA Type**Description**

	ECMC agrees to the amended sampling plan. Inorganic parameters at this location appear to be in compliance with up gradient and cross gradient samples.
1 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**

403474752	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403474785	MONITORING REPORT
403504678	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

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

Total: 0 comment(s)