

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

403696208

Receive Date:

02/23/2024

Report taken by:

Taylor Robinson

## 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 ECMC 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<br>Phone: (970) 730-7281<br>Mobile: ( ) |
| Address: 1099 18TH STREET SUITE 1500 |                             |   |
| City: DENVER                         | State: CO Zip: 80202        |   |
| Contact Person: Dan Peterson         | Email: rbueuf27@chevron.com |   |

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 21781 Initial Form 27 Document #: 402865044

## 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: LOCATION             | Facility ID: 331032                                | API #: _____           | County Name: WELD                         |
| Facility Name: BEELER-64N67W 22NWNE | Latitude: 40.302782                                | Longitude: -104.874191 |   |
|                                     | ** correct Lat/Long if needed: Latitude: 40.303480 | Longitude: -104.873496 |   |
| QtrQtr: NWNE                        | Sec: 22  | Twp: 4N                | Range: 6W Meridian: 6 Sensitive Area? Yes |

## SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Range Land

Is domestic water well within 1/4 mile? No 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

High Priority Habitat - Aquatic Native Species Conservation Waters  
Freshwater Emergent Wetlands 0.03mi W, 0.06/0.12mi N, 0.11/0.13/0.15mi SW  
Riparian Forested Shrub 0.02mi N, 0.18mi W  
Freshwater Forested Shrub Wetland 0.11mi W  
Riverine 0.04/0.11mi N  
Residential Area 0.15mi N, 0.23/0.25mi W  
Farm Structures 0.08/0.09mi NW

## 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       | SOILS          | On former loc    | Lab 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.

A site investigation will be conducted pursuant to COGCC Rule 911 at the BEELER T4N-R67W-S22 L02 Tank Battery location.

### 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 ):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), and at the separator(s). Additionally, soil samples will be collected at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway, where applicable. Soil samples will be analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. All samples collected will be analyzed by a certified laboratory using approved COGCC laboratory analysis methods.

#### Proposed Groundwater Sampling

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

Groundwater was not encountered

#### 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 ):

Additional site investigation is needed to confirm the presence or absence of arsenic and selenium at the following sample locations. B01@7.0', NW01@6.0', NE01@6.0', SE01@6.0', B04@7.0', SW02@6.0', SE03@6.0', SE04@6.0'.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 32

Number of soil samples exceeding 915-1 16

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

Approximate areal extent (square feet) 655

### NA / ND

-- Highest concentration of TPH (mg/kg) 670

-- Highest concentration of SAR 23.9

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 9

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

Highest concentration of Benzene (µg/l)

Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

Highest concentration of Xylene (µg/l)

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?

Eleven background samples between Jan. 2023 and September 2023 were collected from an area not impacted by oil and gas development at similar depths and lithologies as confirmation samples collected at the Beeler location and analyzed for ECMC Table 915-1 metals and soil suitability for reclamation standards (pH, EC, SAR, and Boron). See attached Tables 3 and 4 for details.

☐ 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?

A site investigation was conducted on May 3, 2022 to determine soil and groundwater (if present) impacts. Fifteen soil borings were advanced with a direct push rig and refusal was encountered between nine and 12 feet at the site. A temporary stick-up monitoring well was installed at 12 feet below ground surface to determine if groundwater was present. The well has not made water since being installed. Impacted soils were observed between seven and nine feet in two borings advanced adjacent to the former location of the AST loadout and produced water vault. Additional site investigation is needed to define the extent of As and Se at locations detailed above in the Site Investigation Plan.

## 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.

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.

Data from the site investigation completed September 5, 2023 confirmed pH and SAR in the previously exceeding B02 7 Ft sample location is compliant with the ECMC Table 915-1 soil suitability reclamation standards. Further, resampled locations SE03 6 Ft and B02 (2) 7 Ft were observed to be in compliance with the ECMC Table 915-1 standards for metals.

Should metals concentrations (As and Se) > 915-1 standards remain following resampling of the locations noted in the above Site Investigation Plan a reclamation plan will be developed. This plan will include soil analysis from adjacent undisturbed lands, revegetation techniques, site stabilization, and details of seeded species.

### Soil Remediation Summary

☐ In Situ

☒ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 360

\_\_\_\_\_ Air sparge / Soil vapor extraction

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

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

NA

## 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 Analytical Data

### 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 ECMC rules. Records are available on the ECMC'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: \$ 30000

### 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 360

E&P waste (solid) description Hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: N. Weld Landfill, Ault, CO

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

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes

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

Operator shall comply with the ECMC 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.

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. \_\_\_\_\_

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. 07/19/2021

Actual Spill or Release date, or date of discovery. 03/14/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/02/2022

Proposed site investigation commencement. 11/25/2021

Proposed completion of site investigation. 07/30/2022

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/01/2022

Proposed date of completion of Remediation. 05/31/2024

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:

Lab data indicating elevated metals concentrations > 915-1 standards exist following excavation.

**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: 02/23/2024

Email: ethanb@fremontenv.com

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

ECMC Approved: Taylor Robinson

Date: 03/19/2024

Remediation Project Number: 21781

**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**

|           |                                |
|-----------|--------------------------------|
| 403696208 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403696304 | ANALYTICAL RESULTS             |

Total Attach: 2 Files

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

|               |   |            |
|---------------|---|------------|
| Environmental | Operator shall note that a Reclamation Plan is only relevant to elevated soil suitability parameters in soil pursuant to Rule Rule 915.b.<br><br>Elevated metals must either be removed and cleared with confirmation samples which are below 1.25x background or cleared by nearby background samples. | 03/19/2024 |
|---------------|---|------------|

Total: 1 comment(s)