

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403746263

Receive Date:

Report taken by:

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21246 Initial Form 27 Document #: 402883437

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

Yes Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 123-27338	County Name: WELD
Facility Name: LOUSTALET B 15-15X	Latitude: 40.393418	Longitude: -104.532963	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 15	Twp: 5N	Range: 64W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 481757	API #: _____	County Name: WELD
Facility Name: Loustalet B15-15X	Latitude: 40.393418	Longitude: -104.532963	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 15	Twp: 5N	Range: 64W 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? 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

Freshwater Pond 0.04mi W, 0.19mi N
Riverine 0.09mi S
Freshwater Emergent Wetlands 0.18mi NE, 0.18mi SE, 0.19mi S, 0.24mi W
Riparian Herbaceous 0.17mi NE

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	NA	Laboratory Analysis
Yes	SOILS	8' X 8' X 4' 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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the LOUSTALET B15-15X wellhead cut and cap and flowline removal. Approximately 1340' of flowline will be removed. The ECMC will be updated in a supplemental Form 27 if a portion of the flowline is abandoned-in-place due to field constraints. The wellhead will be cut and capped per ECMC rules. The Flowline Pre-Abandonment Notice Document number is included under Related Forms.

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):

Two grab soil samples were collected for analysis by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, and boron. Additionally, soil sample FS01@4' was analyzed for Table 915-1 metals.

Proposed Groundwater Sampling

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

One groundwater sample was collected at the base of the excavation for analysis of organic parameters in groundwater.

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 Site Assessment was conducted to delineate impacted media at the facility. A total of five soil borings were advanced in the area of impacts. Soil samples were collected and analyzed for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, and pH, EC, SAR, and boron. Each of the five soil borings were converted to temporary groundwater monitoring wells. Five groundwater samples were collected and analyzed for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and inorganic parameters.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 7

-- Highest concentration of TPH (mg/kg) 56.52

Number of soil samples exceeding 915-1 2

-- Highest concentration of SAR 5.55

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

BTEX > 915-1 No

Approximate areal extent (square feet) 64

Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 6

ND Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

ND Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) 4

ND Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed 5

ND Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 0

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?

One background sample was collected and analyzed for pH, EC, SAR, Boron, and ECMC Table 915-1 metals. Additionally, ten background soil samples were collected on 04/18/2023 and analyzed for arsenic, barium, lead and selenium.

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 will be left in place following quarterly groundwater monitoring to determine if a pathway to groundwater is present at the site.

Per the condition of approval (COA) issued in the approved Supplemental Form 27 (Document No. 403693998), the boring logs for background samples collected during April 2023 site investigation activities were requested. Unfortunately, while volatile organic compound (VOC) concentrations measured using a photoionization detector (PID) were recorded for each soil sample, lithologic descriptions were not recorded.

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.

Per the COA issued in the approved Supplemental Form 27 (Document No. 403693998), a metals assessment was conducted to provide justification for the relatively elevated concentrations recorded in soil samples FS01 @ 4', FS02 @ 5', BG04 @ 4', and BG04 @ 5'. The data indicated the below conclusions:

Approximately 76% of the site samples (4 out of 6 confirmation samples and 9 out of 11 background samples) exhibited arsenic and barium concentrations that are generally distributed between the following concentrations:

Arsenic: 0.359 mg/kg and 0.754 mg/kg.
Barium: 8.60 mg/kg and 20.6 mg/kg

The remaining 24% of samples (2 out of 6 confirmation samples and 2 out of 11 background samples) exhibited arsenic and barium concentrations that were higher than the aforementioned data set with a distribution between the following concentrations

Arsenic: 1.56 mg/kg and 4.45 mg/kg.
Barium: 67.3 mg/kg and 286 mg/kg

Additionally, approximately 82% of the site samples (5 out of 6 confirmation samples and 9 out of 11 background samples) exhibited selenium concentrations that are generally distributed between 0.0860 mg/kg and 0.161 mg/kg. The remaining 18% of samples (1 out of 6 confirmation samples and 2 out of 11 background samples) exhibited selenium concentrations that are generally distributed between 0.450 mg/kg and 1.49 mg/kg.

The similarities between the confirmation and background data sets suggests that soils in this location generally exist between a specific range and may exhibit high naturally occurring metals concentrations in soil.

Monitored natural attenuation (MNA) is the selected remediation strategy for the groundwater at this location.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)

No _____ 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.

Five groundwater monitoring wells (MW01-MW05) were installed and are sampled on a quarterly basis. Per the approved Supplemental Form 27 (Document No. 403544389), benzene, toluene, ethylbenzene, total xylenes (BTEX), 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB were removed from the sampling and analysis plan following the second quarter 2023. Additionally, per the above referenced document, dissolved arsenic, barium, lead, and selenium were added to the sampling plan in the fourth quarter 2023. Groundwater samples will be submitted for analysis of TDS, chloride, sulfate, and dissolved arsenic, barium, lead, and selenium until closure criteria are achieved.

First quarter 2024 analytical results indicated that TDS, chloride, and sulfate were in exceedance of the applicable ECMC regulatory standards and greater than 1.25x the background concentrations of the up-gradient monitoring well (MW01) in monitoring well MW05. Inorganic parameters were in compliance with the applicable regulatory standards or within background concentrations in the remaining monitoring well locations. Additionally, the dissolved lead concentration was in exceedance of the CDPHE domestic water supply standard in monitoring well MW02. Dissolved arsenic, barium, and selenium concentrations were in compliance with the CDPHE domestic water supply and agricultural standards in all five monitoring well locations.

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 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: \$ 50000 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

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

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

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? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

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 ECMC 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. 12/31/2025

Proposed date of completion of Reclamation. 12/31/2028

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. 03/15/2022

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). 12/15/2021

Proposed site investigation commencement. 12/15/2021

Proposed completion of site investigation. 12/01/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/01/2023

Proposed date of completion of Remediation. 12/31/2025

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:

The proposed date of completion of remediation has been moved to the end of the fourth quarter 2025.

OPERATOR COMMENT

This Supplemental Form 27 was submitted to summarize quarterly groundwater monitoring activities and analytical results collected during the first quarter 2024 at the former Loustalet B15-15X location.

First quarter 2024 analytical results indicated that TDS, chloride, and sulfate were in exceedance of the applicable ECMC regulatory standards and greater than 1.25x the background concentrations of the up-gradient monitoring well (MW01) in monitoring well MW05. Inorganic parameters were in compliance with the applicable regulatory standards or within background concentrations in the remaining monitoring well locations. Additionally, the dissolved lead concentration was in exceedance of the CDPHE domestic water supply standard in monitoring well MW02. Dissolved arsenic, barium, and selenium concentrations were in compliance with the CDPHE domestic water supply and agricultural standards in all five monitoring well locations.

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The similarities between the confirmation and background data sets suggests that soils in this location generally exist between a specific range and may exhibit high naturally occurring metals concentrations in soil.

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

Signed: Jake Whritenour

Title: Environmental Consultant

Submit Date: _____

Email: chevroneform@tasman-geo.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: _____

Date: _____

Remediation Project Number: 21246

COA Type

Description

0 COA	
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ATTACHMENT 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

403746274	MONITORING REPORT
403789062	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)