

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Krystal Heibel

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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers Phone: <u>(970) 730-7281</u> Mobile: <u>()</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Dan Peterson</u>	Email: <u>rbueuf27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25074 Initial Form 27 Document #: 403152303

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: <u>SPILL OR RELEASE</u>	Facility ID: <u>482023</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Lilli Unit 14-5</u>	Latitude: <u>40.685929</u>	Longitude: <u>-103.888174</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>5</u>	Twp: <u>8N</u>	Range: <u>58W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Range land
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Structures 0.03mi NNW

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. Row 1: Yes, SOILS, Refer to tables and figures, 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.

During tank battery decommissioning activities on, 04/01/2022, one soil sample collected from beneath a separator dumpline exceeded COGCC standards for TPH at 890 mg/kg. A site investigation was conducted to delineate the extent of impacts at the site on, 05/24/2022. Five soil borings were advanced and impacts were observed up to 24' bgs.

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):

Additional soil boring are necessary to define the horizontal and vertical extent of impacts. 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

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

If groundwater is encountered a grab sample will be collected and analyzed for all organic and inorganic compounds per COGCC Table 915-1.

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 between 5/24/2022 and 10/26/2022 to delineate impacted media. Eleven 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, metals in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. Groundwater was not encountered during this assessment.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 41
Number of soil samples exceeding 915-1 34
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 4600

NA / ND

-- Highest concentration of TPH (mg/kg) 21300
-- Highest concentration of SAR 5.47
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 32

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?

One background soil sample was collected adjacent to the Lilli Unit N-5 Tank Battery on 3/31/2022, and 23 background soil samples were collected adjacent to the Lilli Unit O-5 (Location ID 323665, Rem #20862) between 5/3/2022 and 2/28/2024. All soil samples were collected from within lean clay. The highest background concentrations for arsenic, barium, cadmium, lead, and selenium with a 1.25x multiplier applied were calculated to be 18.4 mg/kg, 698 mg/kg, 1.23 mg/kg, 31.8 mg/kg, and 5.08 mg/kg, respectively. The background levels for arsenic, barium, cadmium, lead, and selenium exceed all soil boring concentrations, with the exception of one arsenic concentration at BH09 (33.4 mg/kg). As such, barium, cadmium, lead, and selenium should not be considered contaminants of concern. Additional justification to eliminate arsenic as a contaminant of concern using the nonparametric Mann-Whitney-Wilcoxon rank-sum test is presented in the Operator Comments section of this Form 27.

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 delineated through an environmental site assessment between 5/24/2022 and 10/27/2022 and will be removed through remedial excavation. The results of the 5/24/2022 and 10/27/2022 site assessments are attached to this Form 27. Based on the justification to eliminate metals as contaminants of concern presented in the Site Investigation Report and Operator Comments sections of this Form 27, and the absence of detected concentrations of EC, SAR, and boron above ECOM Table 915-1, Noble proposes to limit excavation confirmatory soil sampling to the analysis of Organic Compounds in Soil per ECOM Table 915-1 and pH.

REMIATION 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.

The soil samples impacted with organic compounds in soil exceeding ECMC Table 915-1 standards (SEP01-DL02@4', BH01, BH04, BH05, BH06, and BH07) will be removed through a remedial excavation. The final excavation extent will be determined through confirmatory soil sampling, in accordance with the proposed sampling plan in the Source Removal Summary section, above. It is currently anticipated that clean excavation overburden soil will be set aside for later use as backfill material. Noble proposes that clean excavation overburden that will be used for backfilling will be confirmed acceptable for use as backfill by sampling one composite sample per every 500-CY of soil, which will be submitted for laboratory analysis of ECMC Table 915-1 organic compounds in soil and TPH (C6-36).

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC 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.

REMEDATION 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 Site Assessment Report and Proposed Remedial Excavation Plan _____

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? _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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 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. 01/09/2023

Proposed date of completion of Reclamation. 01/12/2026

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. 04/15/2022

Actual Spill or Release date, or date of discovery. 04/15/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/01/2022

Proposed site investigation commencement. 08/11/2023

Proposed completion of site investigation. 07/12/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/12/2024

Proposed date of completion of Remediation. 01/12/2025

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 implementation schedule has been updated to reflect the need to complete a remedial excavation at the former Lilli Unit N-5 Tank Battery. The proposed remedial excavation will be completed following the approval of this form, landowner negotiations, and crew availability.

OPERATOR COMMENT

This Supplemental Form 27 was submitted to summarize site assessment activities at the former Lilli Unit N-5 (14-5) location.

Following receipt of analytical results, background and site data for arsenic in soil was compared using the nonparametric Mann-Whitney-Wilcoxon rank-sum test to assess if site concentrations were substantially higher than background concentrations. The results of the metals evaluation indicated that concentrations for all metals of concern recorded in the site data are not substantially different from background concentrations and consequently, are indicative of native soil conditions. Based on the results, no further metals delineation activities are required at this location and Noble is requesting to remove Table 915-1 Metals as COCs for this remediation project. The metals assessment is attached to this Form 27.

The soil samples impacted with organic compounds in soil exceeding ECMC Table 915-1 standards (SEP01-DL02@4', BH01, BH04, BH05, BH06, and BH07) will be removed through a remedial excavation. The final excavation extent will be determined through confirmatory soil sampling, in accordance with the proposed sampling plan in the Remedial Action Plan section of this Form 27. It is currently anticipated that clean excavation overburden soil will be set aside for later use as backfill material. Noble proposes that clean excavation overburden that will be used for backfilling will be confirmed acceptable for use as backfill by sampling one composite sample per every 500-CY of soil, which will be submitted for laboratory analysis of ECMC Table 915-1 organic compounds in soil and TPH (C6-36).

Quarterly reporting will continue through the duration of the remediation project, and the results of the remedial excavation will be submitted on a subsequent Form 27.

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: 03/11/2024

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: Krystal Heibel

Date: 07/17/2024

Remediation Project Number: 25074

COA Type

Description

	If a spill/release of produced fluids or E&P waste causes an impact to soil, the operator should perform sampling and analysis to fully delineate the lateral and vertical extent of those impacts.
	Operator shall provide justification for use of Residential SSL including but not limited to depth to groundwater and the local lithology. Operator has marked "Yes" to: Is groundwater less than 20 feet below ground surface?. Due to shallow groundwater (Less than 20' bgs) reported - Operator shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations. Figure 4 "Water Well Investigation Location Map" doesn't indicate groundwater levels locally at the site.
2 COAs	

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

403715446	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403852836	SITE INVESTIGATION REPORT
403853032	ANALYTICAL RESULTS
403857131	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	"Noble proposes that clean excavation overburden that will be used for backfilling will be confirmed acceptable for use as backfill by sampling one composite sample per every 500-CY of soil, which will be submitted for laboratory analysis of ECMC Table 915-1 organic compounds in soil and TPH (C6-36)." ECMC acknowledges the operators request and does not approve it at this time. Composite samples are only used in cases where stockpiled material is temporarily stored without a liner, prior to removal.	07/17/2024
Environmental	Based on the Operator's assessment of background conditions at the subject location, arsenic results for confirmation soil samples appear to be representative of background as opposed to E&P activities. Therefore, the Operator's demonstration of background will be accepted as an alternative to the default standard in ECMC's Table 915-1.	07/17/2024
Environmental	Due to barium, lead, and selenium Table 915-1 Protection of Groundwater SSL exceedances, ECMC does not approve the Operators reduced analyte suite of removing Table 915-1 metals.	07/15/2024

Total: 3 comment(s)