

State of Colorado
Energy & Carbon Management Commission

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403755498
Receive Date:
04/16/2024
Report taken by:
RICK ALLISON

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 ECOM 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 #: 22140 Initial Form 27 Document #: 402957386

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 #: 123-13801 | County Name: WELD |
| Facility Name: BAKER B2-5 | Latitude: 40.429878 | Longitude: -104.524077 | |
| ** correct Lat/Long if needed: Latitude: 40.429936 | | Longitude: -104.524038 | |
| QtrQtr: SWNW | Sec: 2 | Twp: 5N | Range: 64W Meridian: 6 Sensitive Area? Yes |
| Facility Type: SPILL OR RELEASE | Facility ID: 481822 | API #: _____ | County Name: WELD |
| Facility Name: Baker B 02-05 | Latitude: 40.433711 | Longitude: -104.522169 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: NWNW | Sec: 2 | Twp: 5N | Range: 64W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use crop _____

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? No _____

Other Potential Receptors within 1/4 mile

HPH: no, no waters, dwelling ~0.06 mi S, buildings ~0.11 mi NW, ~0.11 mi SE, and ~0.05 mi S

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 |
|--------------|----------------|------------------|------------------------------------|
| UNDETERMINED | GROUNDWATER | NA | Laboratory Analysis if encountered |
| Yes | SOILS | NA | 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 COGCC Rule 911 a site investigation was conducted pertaining to the Baker B02-05 flowline removal. Approximately 2,050' of flowline was removed, and approximately 310' of flowline was abandoned in place due to field constraints. The wellhead was previously cut and capped per COGCC rules. A Form 44 number for the partial flowline abandonment will be included on a subsequent form 27.

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):

Seven grab soil samples were collected at 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 were 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. Additionally, two soil samples were analyzed for Table 915-1 metals. All samples collected were 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):

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for all organic 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 to delineate impacted media at the facility. A total of six 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 COGCC Table 915-1, metals in soil per COGCC Table 915-1, pH, EC, SAR, and boron. Groundwater was not encountered in any of the six soil borings. One monitoring well was installed at BH01; however, the monitoring well was gauged dry post-installation.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 22

-- Highest concentration of TPH (mg/kg) 14400

Number of soil samples exceeding 915-1 21 -- Highest concentration of SAR 14.1

Was the areal and vertical extent of soil contamination delineated? Yes BTEX > 915-1 Yes

Approximate areal extent (square feet) 50 Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? No Highest concentration of Toluene (µg/l)

Depth to groundwater (below ground surface, in feet) Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1 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?

Five background samples (BG01 through BG05) were collected and analyzed for pH, 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?

Additional investigation will be performed to delineate the SAR exceedance identified at flowline sample FL01-W@3'. After the delineation is complete, a site specific reclamation plan will be generated.

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 identified at FL01-G was delineated through an environmental site assessment and will be removed through a remedial excavation. The source removal is currently scheduled to be completed during 2Q24 ahead of the 2024 growing season, but may need to be postponed due to site access issues. The ECMC will be updated if the implementation schedule is modified. Per the COAs associated with ECMC document numbers 403354026 and 403485236, excavation confirmatory soil samples will be analyzed for TPH (C6-C36), Table 915-1 Organic Compounds in Soils, arsenic, barium, selenium and soil suitability parameters.

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.

Attached to ECMC document number 403652761 was a data summary packet for the delineation sampling event conducted on 11/17/2023 to define the extent of SAR impacts identified during flowline decommissioning at sample location FL01-W@3', and to collect background samples to determine if SAR is naturally occurring. BH07 was advanced at the same location as FL01-W to vertically delineate impacts at that location. FL01-W was located using a Trimble GPS with sub-meter accuracy. BH08-BH11 were advanced surrounding BH07 to vertically and laterally delineate impacts identified at FL01-W@3'. Soil samples were collected at 3-ft and 6-ft bgs, and were analyzed for SAR. Concurrently with the site assessment, a total of ten background samples were collected from five discrete locations (BG06-BG10) and were analyzed for SAR. Based on the findings of the SAR assessment discussed under ECMC Document #403652761, a detailed reclamation plan will be submitted on a subsequent Form 27.

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

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.

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 Schedule Update

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? 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 reseed 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. 05/20/2025

Proposed date of completion of Reclamation. 05/20/2028

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. 04/09/2021

Actual Spill or Release date, or date of discovery. 03/23/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/17/2021

Proposed site investigation commencement. 03/23/2022

Proposed completion of site investigation. 11/02/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/02/2023

Proposed date of completion of Remediation. 05/20/2025

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 completion of the remedial excavation during the second quarter 2024. The completion of remediation is heavily contingent on landowner access to the release location. The ECMC will be updated on a supplemental Form 27 if the implementation is further modified.

OPERATOR COMMENT

This Form 27 is being submitted as a Second Quarter 2024 timeline update for the completion of the remedial excavation at the Baker B02-05 Flowline. The source will be removed in accordance with the Remedial Action Plan section of this Form 27, and the attached proposed excavation map. Please note that the proposed remedial excavation extents shown on the attached figure are approximate, and final remedial excavation extents will be determined through confirmatory soil sampling.

Per the COA associated with ECMC Document # 403652761, a Reclamation Plan will be developed pursuant to Rule 915.b. to leave material with elevated SAR in situ. The detailed reclamation plan 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: 04/16/2024

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: RICK ALLISON

Date: 08/02/2024

Remediation Project Number: 22140

COA Type**Description**

| <u>COA Type</u> | <u>Description</u> |
|-----------------|--------------------|
| 0 COA | |

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**

| | |
|-----------|---|
| 403755498 | INVESTIGATION/REMEDIAL ACTION WORKPLAN (SUPPLEMENTAL) |
| 403797278 | REMEDIAL ACTION PLAN |
| 403875807 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 3 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)