

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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403754926

Receive Date:

04/15/2024

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 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
Contact Person: Dan Peterson	Email: rbueuf27@chevron.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20862 Initial Form 27 Document #: 402856200

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: LOCATION	Facility ID: 323665	API #: _____	County Name: WELD
Facility Name: LILLI UNIT-68N58W 5SWSE	Latitude: 40.685820	Longitude: -103.884010	
** correct Lat/Long if needed: Latitude: 40.685862		Longitude: -103.883548	
QtrQtr: SWSE	Sec: 5	Twp: 8N	Range: 58W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 482192	API #: _____	County Name: WELD
Facility Name: Lilli Unit O-5	Latitude: 40.685537	Longitude: -103.883526	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 5	Twp: 8N	Range: 58W 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? No _____

Is groundwater less than 20 feet below ground surface? No _____

Other Potential Receptors within 1/4 mile

Structures 0.03mi NNW

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
UNDETERMINED	GROUNDWATER	NA	Lab Analysis if Encountered
Yes	SOILS	Refer to Tables and Figures	Lab Analysis and Field Screening

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 was conducted pursuant to ECMC Rule 911, during decommissioning activities at the LILLI UNIT-68N58W -5SESW 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):

Ten (10) grab confirmation soil samples were collected from the produced water vessel (PBV) excavation area, beneath the above-ground oil tanks, and at the separator. Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, and boron. Additionally, one soil sample (FS01 @3.5') was analyzed for metals in soil per ECMC Table 915-1. All samples collected were analyzed by a certified laboratory using approved ECMC 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 ongoing site investigation or forthcoming remedial excavation activities, a grab groundwater sample will be collected and analyzed for all organic compounds per ECMC 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):

Between 8/10/2022 and 1/9/2023, site assessment activities were completed to delineate subsurface soil impacts identified during decommissioning activities at the facility. On 8/10/2022, Tasman advanced five boreholes (BH01-BH05) to 5 feet below ground surface (ft bgs) in the area of the former separator using a hand auger, to delineate elevated SAR. Between 9/20/2022 and 1/9/2023, Tasman advanced 11 additional boreholes (BH06-BH14, BH09R, and BH10R) to delineate hydrocarbon impacts identified near the former PBV. Boreholes BH06-BH10 were advanced using geoprobe direct-push drilling techniques. Boreholes BH09R, BH10R, and BH11-BH14 were advanced using a CME hollow stem auger drill rig. Soil samples were analyzed by a certified laboratory for TPH, organic compounds in soil per ECMC Table 915-1, metals in soil per ECMC Table 915-1, EC, SAR, pH, and boron. The results of these site assessment activities were provided in the subsequent Form 27-Supplemental update (Document No. 403651367).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 59

Number of soil samples exceeding 915-1 32

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 2000

-- Highest concentration of TPH (mg/kg) 2490

-- Highest concentration of SAR 14.3

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 20

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?

A total of twelve (12) background soil samples were collected from six discrete locations (BG01 - BG06) near the former tank battery, at comparable depths and soil composition to the investigation and confirmation soil samples. The background soil samples were submitted for laboratory analysis of arsenic, barium, selenium, and SAR. Concurrently with remedial excavation activities, additional background samples will be collected to determine if pH, SAR, EC, arsenic, barium, cadmium, lead, and selenium are attributed to native soil conditions at the site.

☐ 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 remedial excavation will be conducted to address the remaining soil impacts at the site, as described in the Remedial Action Plan section of this Form 27. Concurrently with remedial excavation activities, additional background samples will be collected to determine if pH, SAR, EC, arsenic, barium, cadmium, lead, and selenium are attributed to native soil conditions at the site.

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.

Between 8/10/2022 and 1/9/2023, site assessment activities were completed to delineate subsurface soil impacts identified during decommissioning activities at the facility. On 8/10/2022, Tasman advanced five boreholes (BH01-BH05) to 5 feet below ground surface (ft bgs) in the area of the former separator using a hand auger to delineate elevated SAR. Soil boring logs were not completed for hand auger locations BH01-BH05. Between 9/20/2022 and 1/9/2023, Tasman advanced 11 additional boreholes (BH06-BH14, BH09R, and BH10R) to delineate hydrocarbon impacts identified near the former PBV. Boreholes BH06-BH10 were advanced using geoprobe direct-push drilling techniques. Boreholes BH09R, BH10R, and BH11-BH14 were advanced using a CME hollow stem auger drill rig. Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECOM Table 915-1, metals in soil per ECOM Table 915-1, EC, SAR, pH, and boron.

The source was delineated through environmental site assessment activities conducted between 8/10/2022 and 1/9/2023, and results were provided in the subsequent Form 27-Supplemental update (Document No. 403651367). Based on the findings of the site assessment, the source material identified at the former PBV will be removed through a remedial excavation in accordance with the proposed excavation map attached to this Form 27. Concurrently with the remedial excavation, additional background samples will be collected to determine if pH, SAR, EC, arsenic, barium, cadmium, lead, and selenium are attributed to native soil conditions at the site. The results of the remedial excavation will be submitted on a subsequent Form 27.

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.

Soil Remediation Summary

☐ **In Situ**

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

☐ **Ex Situ**

_____ 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.

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 Timeline 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 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 ECMC1000 Series Rules.

Is the described reclamation complete? Yes _____

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. 05/03/2022

Proposed date of completion of Reclamation. 07/29/2025

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. 09/02/2021

Actual Spill or Release date, or date of discovery. 05/16/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/03/2022

Proposed site investigation commencement. 08/10/2022

Proposed completion of site investigation. 01/09/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/09/2023

Proposed date of completion of Remediation. 01/29/2025

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 changed due to the site assessment activities completed at the LILLI UNIT-68N58W -5SESW Tank Battery location and the necessity for remedial excavation activities adjacent to the former PBV. The proposed remedial excavation will be completed following the approval of this form, landowner negotiations, and crew availability.

OPERATOR COMMENT

This Form 27 is being re-submitted as a timeline update for the completion of the pending remedial excavation activities. Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The ECMC will be updated with the results of the remedial excavation 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: 04/15/2024

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: 09/09/2024

Remediation Project Number: 20862

COA Type**Description**

	If groundwater is encountered, Operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) and organic compounds in groundwater.
	Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.
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**

403754926	INVESTIGATION/REMEDIAL ACTION WORKPLAN (SUPPLEMENTAL)
403868823	REMEDIAL ACTION PLAN
403914052	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	"Concurrently with the remedial excavation, additional background samples will be collected to determine if pH, SAR, EC, arsenic, barium, cadmium, lead, and selenium are attributed to native soil conditions at the site."	09/09/2024
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Total: 1 comment(s)