



## Watson Facility/Well Discussion Findings

Allison - DNR, Rick <rick.allison@state.co.us>

Mon, Sep 30, 2024 at 2:29 PM

To: "Hoff, Lauren" <lauren.hoff@chevron.com>, Derek Eggert <dhyg@chevron.com>

Cc: Dan Peterson <danpeterson@chevron.com>, Jennifer Skweres <jskweres@tasman-geo.com>, Kyle Waggoner - DNR <kyle.waggoner@state.co.us>, Candice Graber - DNR <nikki.graber@state.co.us>, "Fischer, Alex" <Alex.Fischer@state.co.us>, "Deranleau, Greg" <Greg.Deranleau@state.co.us>

Hello all,

ECMC currently has seven Supplemental Form 27s and one Initial Form 19 in process regarding the Watson E 28-17 / Watson E28-19 wells and production facilities. ECMC is taking the following actions on these forms:

### Remediation Project 33863 (Related to Location ID 421924 Watson E28-19)

[Denied Form 27-S Document #403819089](#): submitted by Kayla White, CDH, on June 10, 2024 as a timeline update. This form will be denied because: 1. It references a site investigation at the "WATSON T6N-R65W-S28 L02 Facility and Tank Battery location" in the Initial Action Summary. No site with this name can be located in COGIS, further adding to the confusion. 2. The proposed Site Investigation Commencement of 12/10/2024 in the Implementation Schedule is approximately eight months after the final wells would have produced to the facilities (assuming the wells were one more more of the following Watson E28-17, Watson E28-19, Watson 11-28, or Watson E28-2).

[Denied Form 27-S Document #403845843](#): submitted by Chris Lattes, Fremont, on July 25, 2024 as a proposal for resampling of certain locations in response to analytical results rendered invalid as a result of incorrect sampling preservation. These data are apparently related to data reported as part of Initial Form 19 Document # 403845629. Maps and data attached, plus the correct lat/long supplied with this Supplemental Form 27 indicate samples were collected near what is called the Watson E28-17 well in COGIS. However, this conflicts with information provided on the original approved Initial Form 27. ECMC agrees the facilities where the Release was discovered need to be resampled. However, we cannot ascertain which facilities Noble is proposing to resample because the issues with Watson E28-17 and E28-19 well naming remain unresolved.

[Denied Form 27-S Document #403883707](#): submitted by Kayla White, CDH, on August 15, 2024 proposing additional time commence the Initial Site Investigation with a statement in the Operator comments that says in part "Pending location landowner approval and/or crew availability, decommissioning of the site infrastructure will be completed as outlined in this proposed remediation workplan." However, the Form 27 above would indicate some investigation has already taken place so ECMC cannot approve this extension. In addition the correct lat/long supplied on this Supplemental Form 27 reverts back to that reported in Supplemental Form 27 Document #403819089 submitted on June 10, 2024. ECMC cannot determine which area Noble intends to investigate.

[Approved with Conditions Initial Form 19 Document #403845629](#): submitted by Jennifer Skweres on July 15, 2024. This form reports a Historical Release discovered based on laboratory analytical results for an AST sample collected apparently near the Watson E 28-17 well (as named in COGIS). Apparently no Remediation Project number has been assigned for decommissioning of production facilities in this area because no Initial Form 27 to investigate these production facilities was submitted. This Form 19 includes a lat/lon similar to that included on Supplemental Form 27 Document #403845843. In order to document that a release has occurred, ECMC has removed the related facility and Spill/Release point name and removed the Request for Closure and approved the form. Once Noble has submitted correct information that clarifies the various locations of the Watson E 28-17 and Watson E 28-19 wells and production facilities, Noble may request closure with Work proceeding under the appropriate Remediation Project number.

### Remediation Project 33857 (Related to API 05-123-32873 Watson E28-19 well)

[Approved with Conditions Supplemental Form 27 Document 403769265](#): submitted by Timothy Krupa, Entrada, This form appears to report data for assessment at the Watson E28-19 well and supplies latitude and longitude coordinates for soil samples collected at what is labeled the Watson E28-19 well in COGIS. The laboratory report indicates that samples were delivered above preservation temperatures and without ice or effort at cooling the samples. Since the Form 27 proposes additional work it has been approved with conditions, as opposed to denied. See the conditions of approval on the Form 27.

[Approved with Conditions Supplemental Form 27 Document 403917954](#): submitted by Lindsey Blankenship, Entrada on September 11, 2024. Form 27 provides a timeline update/Quarterly Report that flowline decommissioning has commenced. This form can be approved. Conditions from Supplemental Form 27 Document #403769265 carry onto this form.

### Remediation Project 34065 (Related to Location ID 319030 Watson 66N65W 28NWNW)

[Denied Supplemental Form 27 Document 403820132](#): submitted by Kayla White, CDH, on June 11, 2024. 1. It references a site investigation at the "WATSON T6N-R65W-S28 L02 Facility and Tank Battery location" in the Initial Action Summary. No site with this name can be located in COGIS, further adding to the confusion. 2. The proposed Site Investigation Commencement of 12/10/2024 in the Implementation Schedule is approximately eight months after the final wells would have produced to the facilities (assuming the wells were one more more of the following Watson E28-17, Watson E28-19, Watson 11-28, or Watson E28-2).

[Denied Supplemental Form 27 Document 403884135](#): submitted by Kayla White, CDH, on September 4, 2024. 1. It references a site investigation at the "WATSON T6N-R65W-S28 L02 Facility and Tank Battery location" in the Initial Action Summary. No site with this name can be located in COGIS, further adding to the confusion. 2. The proposed Site Investigation Commencement of 10/22/2025 in the Implementation Schedule is approximately eight months after the final wells would have produced to the facilities (assuming the wells were one more more of the following Watson E28-17, Watson E28-19, Watson 11-28, or Watson E28-2).

Again, Noble needs to clarify the correct locations of the Watson E28-17 and Watson E28-19 wells, plus the correct production facility locations for the Watson E28-2, Watson 11-28, Watson E28-17 and Watson E28-19 wells. Noble should submit Form 4s for the Locations and/or well APIs as necessary to correct names and coordinates if needed. Noble must submit Supplemental Form 27s for Remediation Project numbers 33863, 33857, and 34065 with correct maps relative to the appropriate well, flowline and production facility and reasonable timelines to complete the investigations based on actual decommissioning schedules.

Richard Allison, P.G.

Northeast Area EPS and Groundwater Investigation Lead

My pronouns: he/him/his



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On Fri, Aug 2, 2024 at 2:52 PM Allison - DNR, Rick <rick.allison@state.co.us> wrote:  
Hi Lauren,

I've done a little more digging and made my own site visit. What I believe happened is that Noble permitted the Watson E 28-17 and Watson E 28-19 wells and then drilled them in opposite places.

Noble then submitted a Form 2A to amend Location 421092 into the Five M horizontal tank battery. This caused this Location to show up in both the location where the Watson E 28-17 well was drilled and the new tank battery location.

At some point the well signs in the field, according to ECMC Inspection Reports as late as 2021, show the wells in the field were labeled opposite of what they are shown in COGIS. But more recently things appear to have switched back to how they are currently shown on the map per the well as drilled locations submitted to ECMC.

Fremont Environmental's lat/lon reported with the Spill purported to be at the Watson E 28-19 tank battery actually plot at the Watson E 28-17 tank battery (to the west).

I think we need the following:

1. Formal documentation from Noble stating where the Watson E 28-17 and Watson E 28-19 were actually drilled.
2. Formal documentation from Noble stating where the production facilities for each well are/were located.
3. Formal request from Noble to remove the Watson E 28-17 from Location ID 421092, and allow Location ID 421092 to continue to represent the existing Five M tank battery.
4. Assign a new Location ID to the Watson E 28-17 and its production facility.
5. Assign a new Location ID to recognize that the Watson E 28-19 , Watson E 28-2 tank battery is separate, if adjacent, to the Five M tank battery.
6. Noble needs to amend one of Remediation Project 34065 and 33863 to accommodate the facility decommissioning that was completed without an approved Form 27.

I'm happy to discuss this further if needed.  
Rick

Richard Allison, P.G.  
Northeast Area EPS and Groundwater Investigation Lead  
My pronouns: he/him/his



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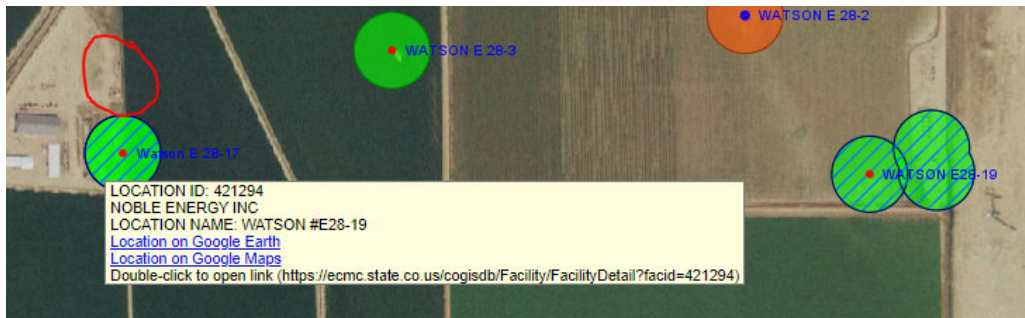
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On Thu, Jul 11, 2024 at 3:31 PM Hoff, Lauren <lauren.hoff@chevron.com> wrote:

Hello Rick!

I was talking with the Remediation team about some comments about some Facility Decom work that had incorrect Facility IDs and I believe we have identified the problem.

1. Below is a shot of the 28-17 Wellhead, with a **Facility that is named 28-19** to the North of the wellhead (but notice that the green hatched circle is around the wellhead, not the facility). This location ID is the same as item #2 below.

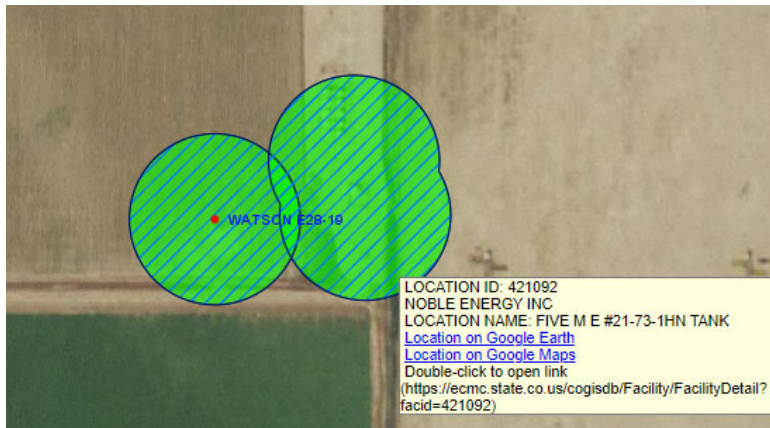


2. The 28-19 **wellhead** is located on the right side of the picture,

The wellhead, and the facility from Item # 1 have the same Location ID, however, they are not associated with each other and are ~0.5mi apart.



3. The 28-19 Wellhead flows to the facility immediately to the right. However, this area is split into two separate facilities. The northernmost end is the Five M E 21-73-1HN Facility. The southern side is where the Watson 28-19 flows. This facility does not have an ECMC Location ID, and the location bubbles currently in place are incorrect and should be further north.



The team will be resubmitting the Form 19 with a corrected site map for the Eastern Facility currently called " Watson E28-19" with a Facility ID of 421294. The lat/longs will also be corrected in the F27 Supplemental.

We would like to request the correction of the Location of the Five 21-73-1 Facility Noted above, along with the creation of a NEW facility ID for the Watson 28-19 and 28-2 wells to flow to at Lat 40.461359/ Long -104.663838.

Please let us know if you would like us to set up a call to walk through this. I think these facility mix ups could be the primary reason for name confusion over the years/past submittals.

Thank you!

Lauren

**Lauren Hoff**

Lead Regulatory Affairs Coordinator

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