

State of Colorado  
Energy & Carbon Management Commission

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403893503  
Receive Date:  
08/23/2024

Report taken by:  
Kyle Waggoner

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 #: 36020 Initial Form 27 Document #: 403806078

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>WELL</u>	Facility ID: _____	API #: <u>123-34781</u>	County Name: <u>WELD</u>
Facility Name: <u>70 RANCH USX BB25-96-1HN</u>		Latitude: <u>40.375930</u>	Longitude: <u>-104.392120</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNW</u>	Sec: <u>25</u>	Twp: <u>5N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland  
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

NA

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. Rows include UNDETERMINED GROUNDWATER and SOILS.

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 70 RANCH USX BB25-96-1HN wellhead cut and cap and will be conducted for the flowline removal.

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 ):

Noble proposes to conduct additional site assessment to verify there is no pathway to groundwater to eliminate the need for excavation.

Please refer to the operator comments section regarding initial decommissioning activities conducted at the Site.

Proposed Groundwater Sampling

X 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 and inorganic 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 ):

Visual inspection of the wellhead area occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 2

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 1

### NA / ND

-- Highest concentration of TPH (mg/kg) 35.7

-- Highest concentration of SAR 1.17

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

### 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

0 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?

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 site assessment will be conducted at the site to verify there is no pathway to groundwater. If applicable, impacted soil will be removed and hauled to a permitted disposal facility in accordance with Rules 905 and 906.

## 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.

If applicable, remediation will be proposed in a subsequent Supplemental Form 27 and hydrocarbon impacted material at the wellhead will be removed and hauled to a permitted disposal facility in accordance with Rules 905 and 906.

### REMEDICATION 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.

Wellhead decommissioning activities and confirmation soil sampling at the 70 Ranch USX BB25-96-1HN wellhead (Site) occurred on July 19, 2024. Two confirmation soil samples were collected from the wellhead excavation (WH01@6) from approximately 6 feet below ground surface (ft-bgs) and from the west sidewall (WH01-W@4) from the same excavation at approximately 4 ft-bgs. One confirmation soil sample (WH01@6) was collected from approximately 6 ft-bgs from the wellhead floor and reported 1-methylnaphthalene (0.007 mg/kg) above the Table 915-1 ECMC GWSSLs and was reported as a historic release in Form 19 document number 403894197. Additional site assessment will be conducted to verify there is no pathway to groundwater. If applicable, impacted material at the wellhead will be removed and hauled to a permitted disposal facility. Remediation activities conducted at the Site will be summarized in a subsequent Supplemental Form 27 submittal and will be reported along with ongoing Remediation Project Number 36020.

**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.

Groundwater was not encountered during excavation of the wellhead for cut and cap activities.

# REMEDATION PROGRESS UPDATE

## PERIODIC REPORTING

### Approved Reporting Schedule:

Quarterly    Semi-Annually    Annually    Other   Quarterly following receipt of Final Lab Results

### 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 Supplemental Form 27

## 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 (policies MWZZ316714 and MWZX316724) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website.

Operator anticipates the remaining cost for this project to be: \$ 20000

## 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:

# 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 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. 08/01/2025

Proposed date of completion of Reclamation. 07/31/2028

## 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. 08/20/2024

Actual Spill or Release date, or date of discovery. 08/19/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/19/2024

Proposed site investigation commencement. 07/19/2024

Proposed completion of site investigation. 01/31/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/01/2025

Proposed date of completion of Remediation. 07/31/2025

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:

Based on the discovery of historic hydrocarbon impacts at the wellhead, source mass removal activities will be initiated following landowner negotiations. The implementation schedule has been updated to reflect these changes.

**OPERATOR COMMENT**

This Supplemental Form 27 was prepared for the historic release that was discovered at 70 Ranch USX BB25-96-1HN wellhead and in connection with the initial Form 19 submitted under Document 403894197.

There are no constructed groundwater wells within 200 feet of the former wellhead. One 1-methylnaphthalene exceedance (0.007 mg/kg) was reported for a soil sample collected from approximately 6 ft-bgs at a concentration slightly above its respective standard (0.006 mg/kg). Noble proposes to conduct additional site assessment to verify there is no pathway to groundwater to eliminate the need for excavation. Whether or not there is a pathway to groundwater will be assessed under Remediation Number 36020, in a subsequent Supplemental Form 27.

Flowline decommissioning activities have not yet commenced but will be summarized in a separate supplemental form 27 submittal. Soil samples will be collected according to the Initial Site Investigation and Remediation Workplan (Document #403806078), approved on 6/27/2024.

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

Signed: Lindsey Blankenship

Title: Associate Geologist

Submit Date: 08/23/2024

Email: chevronfr@entradainc.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: Kyle Waggoner

Date: 10/14/2024

Remediation Project Number: 36020

**COA Type****Description**

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.
	Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil
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**

403893503	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403897143	PHOTO DOCUMENTATION
403897144	ANALYTICAL RESULTS
403897145	SITE MAP
403897146	SOIL SAMPLE LOCATION MAP
403897147	ANALYTICAL RESULTS
403955634	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

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

Environmental	ECMC notes: Flowline decommissioning activities have not yet commenced but will be summarized in a separate supplemental form 27 submittal.	10/10/2024
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Total: 1 comment(s)