

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403922470
Receive Date:
09/17/2024

Report taken by:
Alexander Ahmadian

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: 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 #: 31540 Initial Form 27 Document #: 403465154

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: 306495	API #: _____	County Name: WELD
Facility Name: WASTE MANAGEMENT USX Y-62N64W 3NENW	Latitude: 40.172830	Longitude: -104.539910	
** correct Lat/Long if needed: Latitude: 40.171310		Longitude: -104.542297	
QtrQtr: NENW	Sec: 3	Twp: 2N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 485575	API #: _____	County Name: WELD
Facility Name: Waste Management USX Y03-06	Latitude: 40.171318	Longitude: -104.542282	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 3	Twp: 2N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Rangeland _____

Is domestic water well within 1/4 mile? Yes _____

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:

- | | | |
|--|--|--|
| <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	Lab analysis if encountered
Yes	SOILS	10' x 10' x 3' bgs	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.

A site investigation was conducted pursuant to ECMC Rule 911 at the WASTE MGMT USX T2N-R64W-S3 L08 Facility and 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):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), and at the risers for the flowline(s) and dumpline(s) of any separator(s). Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. 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):

Groundwater was not encountered during remedial excavation activities.

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):

Background samples were collected adjacent to the excavation area to determine if pH, arsenic, and barium should be considered contaminants of concern at the site. Per the approved amended sampling plan (ECMC Document #403699538) soil samples were only analyzed for pH, arsenic, and barium.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 28

Number of soil samples exceeding 915-1 28

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 0.721

Was the areal and vertical extent of soil contamination delineated? Yes

BTEX > 915-1 No

Approximate areal extent (square feet) 625

Vertical Extent > 915-1 (in feet) 5

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?

Ten background soil samples were collected adjacent to the excavation area and were analyzed for pH, arsenic, and barium. Background soil samples were collected from depths ranging between 3 to 5 feet below ground surface (ft bgs). The maximum background value observed for pH was 8.93, and the maximum background concentrations for arsenic and barium, with a 1.25x multiplier applied, were calculated to be 1.80 mg/kg and 164 mg/kg, respectively. All pH, arsenic, and barium concentrations observed in the excavation confirmatory samples were below background levels. As such, pH, arsenic, and barium should not be considered contaminants of concern.

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 removed through a remedial excavation on June 6, 2024, and a summary of the remedial excavation activities is provided in the Remediation Summary section, below. Based on the confirmatory soil sampling analytical results collected from the final remedial excavation extent on June 6, 2024, all Organic Compounds in Soil impacts have been successfully removed. Background samples were collected adjacent to the excavation area and were analyzed for pH, arsenic, and barium. Based on the background analytical results presented in the Site Investigation Report section, pH, arsenic, and barium should not be considered contaminants of concern. As such, Noble is requesting a No Further Action (NFA) designation for the site.

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.

On June 6, 2024, a remedial excavation was advanced to remove all soil impacted with organic compounds and inorganic compounds in soil above ECMC Table 915-1 protection of groundwater soil screening levels (GSSLs) or soil suitability for reclamation (SSR) standards. Confirmatory soil samples were analyzed for ECMC Table 915-1 Organic Compounds in Soil as well as pH, arsenic, and barium per the approved amended sampling plan (ECMC Document #403699538). Based on the confirmatory soil sampling analytical results collected from the final remedial excavation extent (sidewall soil samples SS09@4' through SS12@4' and base sample FS03@5') all samples were in compliance with ECMC Table 915-1 GSSL and SSR standards, and/or below background levels. Refer to the Site Investigation Report section of this Form 27 for a detailed comparison of background sampling results to remedial excavation sampling results.

All soil removed during the remedial excavation was transported off-site for disposal at the Waste Management Buffalo Ridge Landfill. The final remedial excavation extent measured 23-ft by 27-ft by 5-ft bgs.

Soil Remediation Summary

In Situ

Ex Situ

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

- Yes Excavate and offsite disposal
- If Yes: Estimated Volume (Cubic Yards) _____ 120
- 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 Remedial Excavation Report, Background Analytical Results, and NFA Request _____

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.

Operator anticipates the remaining cost for this project to be: \$ 0 _____

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: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes _____

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? Yes _____

Does the previous reply indicate consideration of background concentrations? Yes _____

Does Groundwater meet Table 915-1 standards? Yes _____

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? 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? No

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 09/16/2024

Proposed date of completion of Reclamation. 09/16/2025

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. 01/03/2023

Actual Spill or Release date, or date of discovery. 11/17/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/06/2023

Proposed site investigation commencement. 08/11/2023

Proposed completion of site investigation. 06/06/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/06/2024

Proposed date of completion of Remediation. 06/06/2024

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:

OPERATOR COMMENT

This Form 27 is being submitted to include a summary of the remedial excavation and background sampling completed on June 6, 2024 at the Waste Management USX Y03-06 tank battery, and to include a NFA Request.

Based on the confirmatory soil sampling analytical results collected from the final remedial excavation extent, all Organic Compounds in Soil, pH, arsenic, and barium impacts have been successfully removed, and/or are below background levels. A detailed summary of the remedial excavation is included in the Remedial Action Plan section of this Form 27.

Ten background soil samples were collected near the excavation area and were analyzed for pH, arsenic, and barium per the approved amended sampling plan (ECMC Document #403699538). Background soil samples were collected from depths ranging between 3 to 5 ft bgs. All pH, arsenic, and barium concentrations observed in the excavation confirmatory samples were below background levels. As such, pH, arsenic, and barium should not be considered contaminants of concern. Refer to the Site Investigation Report section of this Form 27 for a detailed comparison of background sampling results to remedial excavation sampling results.

Since all organic compound, inorganic compound, and metals results from the final remedial excavation extent were below ECMC Table 915-1 standards or background levels, Noble is requesting a NFA designation for the site.

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: 09/17/2024

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: _____

Date: _____

Remediation Project Number: 31540

COA Type

Description

0 COA	
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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

403922470	FORM 27 DENIED
403922719	SITE INVESTIGATION REPORT
404022642	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

Environmental	NFA Denied. Operator shall include all lab analytical, sampling locations, photos, and any pertinent information associated with the remediation project on all NFA requests. Operator did not submit all soil sample locations and data.	12/10/2024
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Total: 1 comment(s)