

# State of Colorado Energy & Carbon Management Commission

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Report taken by:

## 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 Phone: (970) 730-7281 Mobile: ( )
Address: 1099 18TH STREET SUITE 1500		
City: DENVER	State: CO Zip: 80202	
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 22552 Initial Form 27 Document #: 402992008

#### 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: 333177	API #:	County Name: WELD
Facility Name: HANSEN BC O-64N67W 1NESE	Latitude: 40.339463	Longitude: -104.832572	
** correct Lat/Long if needed: Latitude: 40.339724		Longitude: -104.830548	
QtrQtr: NESE	Sec: 1	Twp: 4N	Range: 67W Meridian: 6 Sensitive Area? Yes

  

Facility Type: SPILL OR RELEASE	Facility ID: 485166	API #:	County Name: WELD
Facility Name: Hansen BC O-64N67W 1NESE	Latitude: 40.339600	Longitude: -104.830274	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 1	Twp: 4N	Range: 67W Meridian: 6 Sensitive Area? Yes

## **SITE CONDITIONS**

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Prairie Land

Is domestic water well within 1/4 mile? Yes

Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

### **Other Potential Receptors within 1/4 mile**

High Priority Habitat - Mule Deer Severe Winter Range  
Freshwater Emergent Wetlands 0.06mi N  
Riverine 0.18mi SE  
No other potential receptors are located within 1/4 mile of the Site.  
Above distances are approximations.

## 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
No	GROUNDWATER	NA	Lab analysis if encountered
Yes	SOILS	15'x15'x5' deep	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 will be conducted pursuant to ECMC Rule 911 at the HANSEN T4N-R67W-S1 L01 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 separator(s). 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, and EC, SAR, pH, 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 the site investigation.

#### 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 at 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. The applicable ECMC Closure Checklists were utilized and filled out during the abandonment process.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 5

ND Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 5 -- Highest concentration of SAR 0.32  
Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No  
Approximate areal extent (square feet) 225 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?

Five background samples were collected from an area not impacted by oil and gas development at similar depths (4' and 5') and lithologies as confirmation samples collected at the location and analyzed for ECMC Table 915-1 metals and soil suitability for reclamation standards (pH, EC, SAR, and Boron). The samples will be used to characterize native soil and potentially attribute elevated metals and inorganics concentrations to native soil conditions.

The maximum background concentrations for pH (8.93 units) and specific conductance (5.32 mmhos/cm), and metals with a 1.25x multiplier applied arsenic (24.1 mg/kg) and barium (162 mg/kg), were calculated to be greater than concentrations observed in the excavation confirmation samples.

☐ 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?

Elevated pH was observed at the former Hasnsen BC O-64N67W Tank Battery. Soil will be resampled and analyzed for Table 915-1 SRR constituents and at the AST01@0-6" sample location at the same depth (0.5') where the initial elevated pH concentrations were observed. Noble will request an NFA be granted if the reanalyzed samples comply with the Table 915-1 concentration standard. Background samples will be used to justify elevated concentrations.

Alternatively, if the sample results exceed the Table 915-1 standards and cannot be attributed to native soil conditions via background soil characterization a minimum of five additional samples will be collected to delineate the magnitude and extent of elevated constituents. Following completion of the delineation, Noble will submit a detailed reclamation plan to address elevated SSR constituents that includes, but is not limited to, soil analysis from adjacent undisturbed lands, revegetation techniques, site stabilization, and details of seeded species and will request NFA designation be granted under Rule 915.b: Request to leave elevated inorganics in situ.

### REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

#### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 25 cubic yards of impacted soil was removed from the Hansen BC O-64N67W 1NESE produced water vault (PWV) release area by excavation. The impacted soil was disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests are available upon request.

#### 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.

Excavation of impacted soil was undertaken to remove impacts observed four feet below ground surface at the former PWV location. Confirmation soil samples were collected and analyzed for ECMC Table 915-1 organic and Soil Suitability for Reclamation constituents (TPH, BTEX, 1,2,4 Trimethylbenzene, 1,3,5 Trimethylbenzene, Naphthalene, Polycyclic Aromatic Hydrocarbons [PAHs], pH, SAR, EC, and Boron) and ECMC Table 915-1 metals by a certified laboratory.

Five background characterizations samples were collected in native soil, adjacent to the Hansen facility and flowline and analyzed by a certified laboratory for metals and reclamation and soil suitability with regard to the ECMC Table 915-1 standards. The background samples collected from similar depths and lithologies as the samples collected during the Hansen facility decommissioning determined if elevated concentrations of metals and inorganics are attributable to native concentrations since background concentrations are greater than concentrations observed in the excavation confirmation samples. No additional active remediation is required following source removal at the location. The previous excavation report included data from the associated Hansen O 1-23 flowline and the Hansen BC O-64N67W 1NESE PWV with the intent to use local background data and local groundwater data as closure criteria for both the tank battery and flowline. This caused unnecessary confusion and the Operator is reviewing and recompiling the Hansen BC O-64N67W 1NESE PWV excavation report to present data as it pertains to the produced water vault excavation only.

Additional site investigation and remediation is need at the AST01 location to address elevated pH. A no further action (NFA) determination will be requested following sampling detailed in the Site Investigation Report "Is further site investigation required?" section of this form.

### **Soil Remediation Summary**

☐ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

☒ Ex Situ

Yes \_\_\_\_\_ Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 25

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

No \_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

No \_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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 the site investigation or excavation at the Hansen PWV.

## 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 Supplemental Form 27: Timeline Update and Sampling Proposal

### 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 25

E&P waste (solid) description hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Buffalo Ridge Landfill, Keenesburg, CO

Volume of E&P Waste (liquid) in barrels 0

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? No

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 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. 10/31/2025

Proposed date of completion of Reclamation. 10/31/2027

## 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. 02/01/2022

Actual Spill or Release date, or date of discovery. 09/01/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/22/2023

Proposed site investigation commencement. 04/01/2022

Proposed completion of site investigation. 08/22/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/22/2023

Proposed date of completion of Remediation. 03/31/2025

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:

Proposed Completion Date of Site Investigation is based on the date that the site investigation was completed. Updated Remedial Action Dates based on the proposed remedial actions summarized in this Form 27.

**OPERATOR COMMENT**

The Operator acknowledges the seven comments provided on denied document number 403925414. Comments 1-4, and 6 appear to apply to the remedial activities conducted at the Hansen O 1-23 flowline (remediation number 22536). The previous excavation report included data from the associated Hansen O 1-23 flowline and the Hansen BC O-64N67W 1NESE PWV with the intent to use local background data and local groundwater data as closure criteria for both the tank battery and flowline. This caused unnecessary confusion and the Operator is reviewing and recompiling the Hansen BC O-64N67W 1NESE PWV excavation report to present data as it pertains to the produced water vault excavation only (remediation number 22552).

The Operator will return the site and define the extent of soil with elevated pH at the AST01@0-6" sample location, and include soil sample locations on all Figures including but not limited to the following: PWV01-NW@2', AST01@0-6", AST02@0-6", SEP01-DL@4'. These and all other missing soil sample locations shall be included on the Figure(s) in the next Form 27-Supplemental for verification purposes.

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

Signed: Ethan Black

Title: Consultant

Submit Date: \_\_\_\_\_

Email: ethanb@fremontenv.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: 22552

**COA Type****Description**

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**

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Total Attach: 0 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)