

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Abdul Elnajdi

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: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20470 Initial Form 27 Document #: 402837667

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: 323751	API #: _____	County Name: WELD
Facility Name: PETRIKIN-66N64W 34SENE	Latitude: 40.444690	Longitude: -104.529190	
** correct Lat/Long if needed: Latitude: 40.446200		Longitude: -104.529691	
QtrQtr: SENE	Sec: 34	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 481756	API #: _____	County Name: WELD
Facility Name: Petrikin A34-8 Tank Battery	Latitude: 40.446231	Longitude: -104.529526	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 34	Twp: 6N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Crop 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? No _____

Other Potential Receptors within 1/4 mile

Industrial 0.05mi N
Freshwater Emergent Wetlands 0.03mi W
Riverine 0.03mi W, 0.13mi SW
Residential 0.23mi NE

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	TBD	Site Assessment
Yes	SOILS	13' X 18' X 5' bgs	Laboratory 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 COGCC Rule 911 at the PETRIKIN T6N-R64W-S34 L04 Tank Battery location. Laboratory analytical indicated a historical release at the Petrikin A34-08 decommissioned tank battery. One soil sample exceeded COGCC standards for 1-methylnaphthalene at 0.0983 mg/kg, and 2-methylnaphthalene at 0.0514 mg/kg.

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):

Seven 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 will be analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. Additionally, soil sample FS01@5' was analyzed for Table 915-1 metals.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

If groundwater is encountered the source soil boring will be completed as a monitoring well. Groundwater samples will be collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and inorganic parameters.

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):

A Site Assessment was conducted between 2/27/2023 and 4/15/2024 to delineate impacted media. Fifteen soil borings were advanced in the area of impacts. Soil boring FS01 was advanced at the same location as the waste characterization sample FS01@5' to vertically delineate impacts at that location. Soil borings FS02-FS05 and BH01-BH09R were advanced surrounding FS01 to vertically and laterally delineate impacts identified at FS01@5'. Soil samples were collected and analyzed for a combination of TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil, metals in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. Groundwater was not encountered during this assessment within 12-ft of the ground surface.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 50 -- Highest concentration of TPH (mg/kg) 488
 Number of soil samples exceeding 915-1 35 -- Highest concentration of SAR 17.5
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No
 Approximate areal extent (square feet) 100 Vertical Extent > 915-1 (in feet) 7

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?
 A total of 21 background samples were collected at the site between March 28, 2022 and April 15, 2024, which were analyzed for a combination of and analyzed for pH, SAR, arsenic, barium, lead, and selenium. The lithology at the site is relatively consistent across all sample intervals, and generally consists of clay with some sand and silt. The maximum background concentrations of arsenic, barium, lead, and selenium with a 1.25 multiplier applied were calculated to be 11.1 milligrams per kilogram (mg/kg), 59.6 mg/kg, 15.8 mg/kg, and 1.86 mg/kg, respectively. The highest background levels for pH and SAR were observed to be 8.66 and 11.5, respectively. Since all concentrations of arsenic, lead, and selenium in decommissioning and soil boring samples were calculated to be less than background levels, arsenic, lead and selenium 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 delineated through an environmental site assessment conducted between 2/27/2023 and 4/15/2024. Groundwater was not identified during the site assessment. Given the stiff clays and silts identified at depths ranging from 8-12-ft bgs in the soil boring logs, it is unlikely that the organic compounds identified during decommissioning will migrate vertically to reach the groundwater table. Since a pathway to groundwater was not identified, Noble proposes to apply ECMC Table 915-1 Residential Soil Screening Levels (RSSLs) when evaluating soil analytical results. Since all organic compounds and metals in soil are either below ECMC Table 915-1 RSSLs (barium) or established background levels (arsenic, lead, and selenium), metals and organic compounds should not be considered contaminants of concern.
 Based on the successful delineation of pH and SAR above ECMC Table 915-1 Soil Suitability for Reclamation (SSR) standards, Noble proposes to leave the elevated pH and SAR in-situ, and generate a detailed reclamation plan to address these compounds during reclamation. The reclamation plan will be submitted on a subsequent Form 27, concurrently with a No Further Action (NFA) request.

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.
 NA

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.

Groundwater was not encountered during the decommissioning or supplemental site investigation activities.

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 Site Investigation Report, Proposed Reclamation Plan

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 COGCC rules. Records are available on the COGCC'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 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. 03/03/2022

Proposed date of completion of Reclamation. 06/30/2025

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. 03/15/2022

Actual Spill or Release date, or date of discovery. 03/14/2022

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 11/11/2021

Proposed completion of site investigation. 04/15/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/15/2024

Proposed date of completion of Remediation. 02/28/2025

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 updated to reflect the schedule for preparing a detailed reclamation plan for the site. The detailed reclamation plan will be submitted on a subsequent Form 27.

OPERATOR COMMENT

This Form 27 is being submitted as a Fourth Quarter 2024 timeline update, and to include all historical soil data collected at the Petrikin A34-08 Tank Battery, including the results of the recently completed April 2024 supplemental site investigation. Please note that all data represented in this Form 27 was previously submitted to the ECMC under Form 27 Document # 403904829 on August 29, 2024. However, as of the date of this submittal, the previously submitted Form 27 has not been approved.

Based on the successful delineation of pH and SAR above ECMC Table 915-1 Soil Suitability for Reclamation (SSR) standards, Noble proposes to leave the elevated pH and SAR in-situ, and generate a detailed reclamation plan to address these compounds during reclamation. The reclamation plan will be submitted on a subsequent Form 27, concurrently with a No Further Action (NFA) request.

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: 11/20/2024

Email: tas-chevron-3@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: Abdul Elnajdi

Date: 12/23/2024

Remediation Project Number: 20470

COA Type**Description**

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**

404001174	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
404001198	SITE INVESTIGATION REPORT
404001200	SITE INVESTIGATION REPORT
404001202	SITE INVESTIGATION REPORT
404001203	SITE INVESTIGATION REPORT
404038343	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 6 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)