

State of Colorado
Energy & Carbon Management Commission

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Receive Date:

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
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 7307281
City: DENVER State: CO Zip: 80202		Mobile: ()
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25628 Initial Form 27 Document #: 403207715

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: 327139	API #: _____	County Name: WELD
Facility Name: KILDOW PM C-64N64W 31NWNE	Latitude: 40.273940	Longitude: -104.591040	
** correct Lat/Long if needed: Latitude: 40.275880		Longitude: -104.591350	
QtrQtr: NWNE	Sec: 31	Twp: 4N	Range: 64W Meridian: 6 Sensitive Area? No
Facility Type: SPILL OR RELEASE	Facility ID: 484174	API #: _____	County Name: WELD
Facility Name: Kildow PMC 31-2 Tank Battery	Latitude: 40.275875	Longitude: -104.591218	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 31	Twp: 4N	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

Farm Structures 0.12/0.12/0.13 WSW, 0.19 SW, 0.17/0.19 SE
Residential 0.14 WSW, 0.18 SW, 0.15 ESE

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	Laboratory Analysis and Field Screening if encountered
Yes	SOILS	Refer to Tables and Figures	Laboratory Analysis and Field Screening

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 KILDOW PM T4N-R64W-S31 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 excavation, beneath the above-ground oil tanks, and at the separators. 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, EC, SAR, pH, and boron. Additionally, one soil sample (FS01@7) was analyzed for metals in soil per ECMC Table 915-1. All samples collected were analyzed by a certified laboratory using ECMC approved laboratory analysis methods.

Proposed Groundwater Sampling

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

If groundwater is encountered during site investigation activities, groundwater samples will be collected and analyzed for all organic and inorganic compounds in groundwater 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 at the tank battery 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. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to a previous Form 27 (Document No. 403455437).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected 35	-- Highest concentration of TPH (mg/kg) 324

Number of soil samples exceeding 915-1 23 -- Highest concentration of SAR 3.05

Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No

Approximate areal extent (square feet) 2300 Vertical Extent > 915-1 (in feet) 15

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?

On 03/28/2023, three background soil samples were collected near the former facility. Two samples were analyzed for pH, SAR, EC, and Boron and one soil samples was analyzed for Metals in soil per ECMC Table 915-1 and pH, SAR, EC, and Boron. On 09/26/2023, ten background soil samples were collected near the former tank battery and were analyzed for metals in soil per ECMC Table 915-1 and pH and EC. Background soil samples were collected from depths ranging between 2.5 to 12 feet below ground surface (ft bgs). The maximum background concentration for pH was observed to be 8.97. The maximum background concentration with a 1.25x multiplier applied for lead was calculated to be 49.1 mg/kg. All pH and lead concentrations observed during decommissioning and supplemental site investigation activities were below background levels.

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?

Laboratory data is still pending from the supplemental site investigation (SSI) completed on 12/06/2024. Additional SSI activities will be proposed, as applicable, on a subsequent Form 27.

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.

Refer to the Remediation Summary section below.

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.

Site Assessments were conducted on 4/20/2023 and 9/26/2023 to delineate impacted media, during which ten soil borings (BH01-BH10) were advanced. Soil boring BH01 was advanced at the same location as the waste characterization sample FS01@7' to vertically delineate impacts at that location. Soil borings BH02 - BH10 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at FS01@7'.

Additional site assessments were conducted on 11/21/2024 and 12/6/2024 to further vertically and laterally delineate impacts. On 11/21/2024, BH09R was advanced to vertically delineate the 1,2,4, Trimethylbenzene (TMB), 1,3,5,-TMB and Naphthalene impacts identified at BH09@7-8'. BH12 was advanced to vertically and laterally delineate the impacts identified at BH09@7-8'. On 12/6/2024 BH07R, BH08R, BH11, and BH13-BH16 were advanced to vertically and laterally delineate impacts identified at BH07, BH08, and BH09. Analytical data is still pending from the 12/6/2024 supplemental site investigation and will be reported on a subsequent form 27.

Additional SSI activities will be proposed, as applicable, on a subsequent form 27.

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.

No groundwater was encountered during decommissioning or 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 Supplemental Site Investigation Sample Summary

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? 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? No

Does the previous reply indicate consideration of background concentrations? _____

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? _____

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. 03/28/2023

Proposed date of completion of Reclamation. 12/16/2025

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. 09/29/2022

Actual Spill or Release date, or date of discovery. 04/05/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/28/2023

Proposed site investigation commencement. 01/16/2025

Proposed completion of site investigation. 04/16/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/16/2025

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

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 changed due to the completion of the 4Q24 supplemental site investigations (SSI) at the Kildow PMC 31-2 tank battery and necessity for potential additional supplemental site investigation activities adjacent to the tank battery.

OPERATOR COMMENT

This Form 27 is being submitted to include supplemental site investigation (SSI) results for the former Kildow PMC 31-2 Tank Battery. A comprehensive data packet summarizing the SSI activities completed on 11/21/2024 is attached to this form 27, and a detailed summary of the previously completed SSI activities is presented in the Remedial Action Plan sections and below.

Site Assessments were conducted on 4/20/2023 and 9/26/2023 to delineate impacted media, during which ten soil borings (BH01-BH10) were advanced. Soil boring BH01 was advanced at the same location as the waste characterization sample FS01@7' to vertically delineate impacts at that location. Soil borings BH02 - BH10 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at FS01@7'.

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Additional SSI activities will be proposed, as applicable, on a subsequent form 27.

On 03/28/2023, three background soil samples were collected near the former facility. Two samples were analyzed for pH, SAR, EC, and Boron and one soil samples was analyzed for Metals in soil per ECMC Table 915-1 and pH, SAR, EC, and Boron. On 09/26/2023, ten background soil samples were collected near the former tank battery and were analyzed for metals in soil per ECMC Table 915-1 and pH and EC. Background soil samples were collected from depths ranging between 2.5 to 12 feet below ground surface (ft bgs). The maximum background concentration for pH was observed to be 8.97. The maximum background concentration with a 1.25x multiplier applied for lead was calculated to be 49.1 mg/kg. All pH and lead concentrations observed during decommissioning and supplemental site investigation activities were below background levels.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project.

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

Signed: Andy Sagen

Title: Environmental Consultant

Submit Date: _____

Email: tas-chevron-1@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: 25628

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
404061338	OTHER
404061347	ANALYTICAL RESULTS

Total Attach: 2 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)