

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403935398
Receive Date:
10/04/2024
Report taken by:
Nick Cholas

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: rbueuf27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36252 Initial Form 27 Document #: 403841536

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: 330044	API #: _____	County Name: WELD
Facility Name: HANSCOME-64N65W 11NWNW	Latitude: 40.331170	Longitude: -104.636010	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 11	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

Within Mule Deer Severe Winter Range HPH
Bald Eagle Roost or Communal Roost HPH 22ft N
Aquatic Native Species Conservation Waters HPH 0.08mi W
Bald Eagle Active Nest Site - Half Mile Buffer HPH 0.17mi NE
Riverine 0.18mi W
Freshwater Pond 0.15mi NE, 0.22mi SW, 0.23mi N, 0.24mi NW
Freshwater Emergent Wetland 0.14mi E, 0.18/0.23mi W, 0.21mi SW

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
Yes	GROUNDWATER	Refer to Tables and Figures	Lab analysis
Yes	SOILS	Refer to Tables and Figures	Lab 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 ECOM Rule 911 at the HANSCOME T4N-R65W-S11 L02 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 excavation, beneath the ground oil tank, at the risers for the flowlines and dump lines of the separators. In addition, the on-site dump lines located between the separator and tank battery will be removed by pulling from either end. 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 ECOM Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECOM laboratory analysis methods.

Proposed Groundwater Sampling

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

Groundwater was encountered during the site investigation and a grab groundwater sample (GW01) was collected and analyzed for all organic and inorganic compounds per ECOM Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 8
Number of soil samples exceeding 915-1 5
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 500

NA / ND

-- Highest concentration of TPH (mg/kg) 700
-- Highest concentration of SAR 11.3
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 4
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 1

-- Highest concentration of Benzene (µg/l) 320
ND Highest concentration of Toluene (µg/l) _____
ND Highest concentration of Ethylbenzene (µg/l) _____
-- Highest concentration of Xylene (µg/l) 270
NA 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?

Three background soil samples were collected adjacent to the tank battery and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging between 0.5 to 4 feet below ground surface (ft bgs) and the lithology between the site and background locations were observed to be well sandy clay and lean clay. The maximum background concentration observed for pH was 8.71. The maximum background concentrations with a 1.25x multiplier applied for arsenic and selenium were calculated to be 5.63 mg/kg and 0.654 mg/kg, respectively. All arsenic and selenium concentrations observed during decommissioning were below background levels. As such, Noble is requesting that arsenic 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?

A supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the organic compound exceedances observed during decommissioning. A proposed SSI map is attached to this Form 27. Based on the ECMC Table 915-1 exceedances identified during decommissioning, Noble proposes to limit future soil sampling to BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, TPH, 1-methylnaphthalene (M), 2-M, and pH. Concurrently with the SSI, additional background samples will be collected to determine if elevated pH values are attributed to native soil conditions at the site. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

If soil that is more heavily impacted with hydrocarbon compounds (based on PID readings, visual and/or olfactory indicators) is discovered during the SSI, a soil sample will be collected from that location and analyzed for full ECMC Table 915-1 contaminants of concern. If additional analytes are discovered from this new waste characterization sample in exceedance of ECMC Table 915-1 standards beyond those proposed in the above amended sampling plan request, those compounds will be added to the sampling plan.

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.

An SSI will be completed to vertically and horizontally delineate the benzene, ethylbenzene, 1,2,4-TMB, TPH, naphthalene, 1-M, 2-M, and pH exceedances observed during decommissioning, in accordance with the attached proposed site investigation map, and proposed sampling plan outlined in the Site Investigation Report of this Form 27.

Groundwater monitoring will be conducted following the delineation and removal of source material. If groundwater is encountered during the delineation activities, a groundwater monitoring well will be installed and the groundwater will be sampled.

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 encountered and sampled during site investigation activities. One groundwater sample (GW01) was collected in the produced water vault excavation and was submitted for laboratory analysis of BTEX, naphthalene, TMBs, total dissolved solids (TDS), chloride, and sulfate. Analytical results indicated organic compound detections, including benzene concentrations in exceedance of the ECMC table 915-1 standards for organic compounds in groundwater. Additionally, inorganic compound exceedances were identified. Following the soil delineation and source removal, a minimum of five groundwater monitoring wells will be installed and will be sampled on a quarterly basis for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and groundwater inorganic parameters.

If groundwater is encountered during the soil delineation activities, a groundwater monitoring well will be installed.

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 Decommissioning Sample Summary & Supplemental Site Investigation 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? 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 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. 09/25/2024

Proposed date of completion of Reclamation. 10/02/2026

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. 06/06/2024

Actual Spill or Release date, or date of discovery. 09/26/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/25/2024

Proposed site investigation commencement. 10/02/2024

Proposed completion of site investigation. 04/02/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/02/2025

Proposed date of completion of Remediation. 10/02/2025

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 decommissioning of the Hanscome 64N65W 11NWNW Tank Battery and necessity for supplemental site investigation activities adjacent to the wellhead/flowline/tank battery. The proposed site investigation will be completed following the approval of this form, landowner negotiations, and crew availability.

OPERATOR COMMENT

This Form 27 is being submitted to include the decommissioning results and historic reportable release discovered at the former Hanscome 64N65W 11NWNW Tank Battery location. A proposal to delineate the organic compound exceedances identified during decommissioning (soil samples PWV01-B@4', PWV01-E@2.5', and AST01@0-6") is presented in the Site Investigation Report section of this Form 27.

Three background soil samples were collected from adjacent to the facility and the lithology between the site and background locations was observed to be lean clays and clayey sands. The maximum background concentrations of arsenic and selenium were 4.50 mg/kg and 0.523 mg/kg, respectively, and 1.25 the maximum background concentrations were calculated to be 5.63 mg/kg and 0.654 mg/kg, respectively. All site arsenic and selenium concentrations were below these concentrations. Since the maximum background concentrations for arsenic and selenium were observed to be greater than site concentrations, Noble requests arsenic and selenium to not be considered contaminants of concern.

Based on the contaminants of concern identified during decommissioning, Noble proposes to limit future soil sampling to BTEX, naphthalene, 1,2,4-TMB, 1,3,5-TMB, TPH (C6-C36), 1-M, 2-M, and pH. Concurrent with delineation activities, additional background samples will be collected to determine if elevated pH values observed at this location are indicative of native material conditions.

Groundwater monitoring will be conducted following the delineation and removal of source material.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation will be submitted on a subsequent Form 27.

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

Signed: Jake Whritenour

Title: Environmental Consultant

Submit Date: 10/04/2024

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: John Heil

Date: 02/19/2025

Remediation Project Number: 36252

COA Type**Description**

	Comply with all outstanding COAs.
	Operator shall include Spill/Release ID 488103 on all subsequent Form 27 Supplementals.
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**

403935398	FORM 27-SUPPLEMENTAL-SUBMITTED
403943600	ANALYTICAL RESULTS
403943607	ANALYTICAL RESULTS
403944705	SITE INVESTIGATION PLAN
403946201	OTHER

Total Attach: 5 Files

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

Environmental	ECMC approves the requested reduced analyte suite of BTEX, naphthalene, 1,2,4TMB, 1,3,5-TMB, TPH (C6-C36), 1-M, 2-M, and pH.	02/19/2025
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Total: 1 comment(s)