

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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404034865

Receive Date:

12/19/2024

Report taken by:

Grace Rollins

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 ECOM 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 #: 36226 Initial Form 27 Document #: 403828818

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

No Multiple Facilities

Facility Type: LOCATION	Facility ID: 333284	API #: _____	County Name: WELD
Facility Name: ROACH N-65N67W 14NWSE	Latitude: 40.399380	Longitude: -104.859730	
	** correct Lat/Long if needed: Latitude: 40.399751	Longitude: -104.859862	
QtrQtr: NWSE	Sec: 14	Twp: 5N	Range: 6W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? No 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

Freshwater Emergent Wetland 0.22mi SE
Commercial 0.08/0.12/0.19/0.2mi W, 0.24mi NW
Apparent Pond 0.22mi W

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	NA	Lab analysis if encountered
Yes	SOILS	Refer to ECMC Document #40391672	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 ECMC Rule 911 at the RAGAN ROACH T5N-R67W-S1 L01 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), at the risers for the flowline (s) and dumphine(s) of any separator(s). In addition, the on-site dump lines located between the separator and tank battery were 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 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. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to ECMC Document No. 403916727.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC 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. Additionally, discrete soil samples were collected from the base of the excavation and excavation sidewall in areas most likely to be impacted and exhibiting the highest field screened VOC concentration. The ECMC Tank Battery and Produced Water Vessel Closure Checklists were utilized and filled out during the abandonment process.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 16

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) 569

-- Highest concentration of SAR 0.249

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

Highest concentration of Benzene (µg/l)

Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

Highest concentration of Xylene (µg/l)

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?

Four background soil samples were collected near 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 6 feet below ground surface (ft bgs). The maximum background concentrations for pH, SAR, and EC were observed to be 8.64, 0.581, and 0.331, respectively. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and lead were calculated to be 5.26, 131, and 9.06, respectively.

☐ 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?

Based on decommissioning analytical results, a remedial excavation will take place to remove the 1-Methyl-Napthalene (M), 2-M, 1,2,4-Trimethyl-benzene (TMB), 1,3,5-TMB, Napthalene, and TPH exceedances observed at AST01@0-6" and to remove the 1-M and 2-M exceedances observed at AST02@0-6. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to ECMC Document No. 403916727.

Concurrently with the remedial excavation, a supplemental site investigation (SSI) will be completed to collect additional background samples around the former tank battery to determine if the elevated pH, arsenic, barium and lead concentrations are attributed to the native soil conditions at the site. Soil samples will be analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The proposed background soil boring locations are illustrated on Figure 1.

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.

Based on decommissioning analytical results, a remedial excavation will take place to remove the 1-Methyl-Napthalene (M), 2-M, 1,2,4-Trimethyl-benzene (TMB), 1,3,5-TMB, Napthalene, and TPH exceedances observed at AST01 @0-6" and to remove the 1-M and 2-M exceedances observed at AST02@0-6. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to ECMC Document No. 403916727.

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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.

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 Fourth Quarter 2024 -Timeline Update

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 ECOM rules. Records are available on the ECOM'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:

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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. 09/10/2024

Proposed date of completion of Reclamation. 09/19/2026

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. 05/16/2024

Actual Spill or Release date, or date of discovery. 09/11/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/10/2024

Proposed site investigation commencement. 12/19/2024

Proposed completion of site investigation. 06/19/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/19/2025

Proposed date of completion of Remediation. 09/19/2025

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 necessity for remedial excavation activities adjacent to the former tank battery. Based on decommissioning analytical results, a remedial excavation will take place to remove the 1-Methyl-Naphthalene (M), 2-M, 1,2,4-Trimethyl-benzene (TMB), 1,3,5-TMB, Naphthalene, and TPH exceedances observed at AST01@0-6" and to remove the 1-M and 2-M exceedances observed at AST02@0-6.

Concurrently with the remedial excavation, a supplemental site investigation (SSI) will be completed to collect additional background samples around the former tank battery to determine if the elevated pH, arsenic, barium and lead concentrations are attributed to the native soil conditions at the site. Soil samples will be analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The proposed background soil boring locations are illustrated on Figure 1.

OPERATOR COMMENT

This Supplemental Form 27 is being submitted as a fourth quarter 2024 timeline update for the former Roach N-65N67W 14NWSE tank battery location.

Based on decommissioning analytical results, a remedial excavation will take place to remove the 1-Methyl-Napthalene (M), 2-M, 1,2,4-Trimethyl-benzene (TMB), 1,3,5-TMB, Napthalene, and TPH exceedances observed at AST01@0-6" and to remove the 1-M and 2-M exceedances observed at AST02@0-6. A detailed summary of decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to ECMC Document No. 403916727.

Concurrently with the remedial excavation, a supplemental site investigation (SSI) will be completed to collect additional background samples around the former tank battery to determine if the elevated pH, arsenic, barium and lead concentrations are attributed to the native soil conditions at the site. Soil samples will be analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. The proposed background soil boring locations are illustrated on Figure 1.

Quarterly reporting will be conducted until closure criteria are achieved.

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

Signed: Mike Medina

Title: Environmental Consultant

Submit Date: 12/19/2024

Email: Tas-Chevron-2@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: Grace Rollins

Date: 02/20/2025

Remediation Project Number: 36226

COA Type

Description

	ECMC has processed this form as an update; no analytical was attached thus approval of this form does not imply any agreement with comments on completion of site investigation. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
1 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

404034865	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
404035080	SITE INVESTIGATION PLAN
404102138	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)