

State of Colorado  
Energy & Carbon Management Commission

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Document Number:

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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) 730-7281
City: DENVER	State: CO	Zip: 80202
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	Mobile: ( )

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 25984 Initial Form 27 Document #: 403210529

## 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: 319550	API #: _____	County Name: WELD
Facility Name: BOULTER-64N65W 11NWSW	Latitude: 40.325300	Longitude: -104.637241	
** correct Lat/Long if needed: Latitude: 40.325464		Longitude: -104.635428	
QtrQtr: NWSW	Sec: 11	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? No

Facility Type: SPILL OR RELEASE	Facility ID: 483843	API #: _____	County Name: WELD
Facility Name: Boulter 64N65W 11NWSW	Latitude: 40.325464	Longitude: -104.635428	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 11	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

## **SITE CONDITIONS**

General soil type - USCS Classifications SW \_\_\_\_\_

Most Sensitive Adjacent Land Use crop \_\_\_\_\_

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**

No potential receptors are located within ¼ mile of the Site.

## 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	TBD	Laboratory Analysis
Yes	SOILS	150'x80'x5'	Field Screening and 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 was conducted pursuant to ECMC Rule 911 at the BOULTER T4N-R65W-S11 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 encountered during tank battery decommissioning activities on 1/25/2023 and two grab groundwater samples were collected and analyzed for all organic compounds per ECMC Table 915-1 in accordance with the approved initial sample plan from document #: 403210529.

Groundwater was also encountered during site investigation activities on 10/19/2023 while defining the magnitude and extent of impacts on location. A temporary monitoring well was installed and sampled for all organic compounds per ECMC Table 915-1.

Henceforth, if any further groundwater is encountered during additional site assessment/remedial activities, groundwater sample(s) will be collected and analyzed for all organic compounds and inorganic parameters per 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. 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 18

Number of soil samples exceeding 915-1 18

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 12000

**Groundwater**

Number of groundwater samples collected 3

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 5

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 915-1 3

**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.

**NA / ND**

-- Highest concentration of TPH (mg/kg) 3000

-- Highest concentration of SAR 7.96

BTEX &gt; 915-1 Yes

Vertical Extent &gt; 915-1 (in feet) 7

-- Highest concentration of Benzene (µg/l) 2200

-- Highest concentration of Toluene (µg/l) 5000

-- Highest concentration of Ethylbenzene (µg/l) 1100

-- Highest concentration of Xylene (µg/l) 15000

NA Highest concentration of Methane (mg/l)

**OTHER INVESTIGATION INFORMATION**☐ Were impacts to adjacent property or offsite impacts identified?☒ Were background samples collected as part of this site investigation?

Six background samples were collected in native soil, off-pad, adjacent to the Boulter 64N65W facility. Samples were collected from similar depths and lithologies as confirmation samples and analyzed for ECMC Table 915-1 Soil Suitability for Reclamation constituents and metals.

☐ 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 organic compound exceedances observed at sample locations AST CEN. SURF., DL TRENCH E WALL 3FT and PWV E WALL 4FT will be removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents.

**REMEDIAL 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.

Laboratory analytical results indicated historical releases had occurred at the locations of soil samples AST CEN. SURF., DL TRENCH E WALL 3FT and PWV E WALL 4FT and was reported as a historic release in Form 19 document number 403311480.

The source will be excavated and confirmation soil samples will be collected and analyzed for the full Table 915 suite. The proposed excavation extent is displayed on Figure 5 of the attached site investigation report from document #: 403733056.

If groundwater is encountered during the excavation of impacted soil, a groundwater sample will be collected for Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS).

If residual soil and/or groundwater impacts are observed following the excavation completion remedial actions will be evaluated and may include but are not limited to installation of groundwater monitoring wells, active remediation (air sparge or soil vapor extraction), in situ chemical oxidation, etc. to address the impacts.

Estimated time to achieve NFA status ranges from 90 days following completion of excavation if groundwater is observed to be unimpacted to a minimum of year following excavation completion if groundwater is impacted.

## **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.

Following remedial excavation completion the operator proposes to install soil borings that will be improved with temporary PVC monitoring wells. One monitoring well will be installed within the source area (if possible) and additional wells will be installed to monitor up-gradient, down-gradient, and cross-gradient groundwater conditions. Each soil boring location will have the soil type logged, will be field screened with a PID, and the interval with the highest PID measurement and/or the interval directly above groundwater will be collected and submitted for analysis of Table 915-1 constituents in soil. Quarterly groundwater monitoring will be conducted until four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents below regulatory limits. Groundwater monitoring wells will be sampled and submitted to a laboratory for analysis of Table 915-1 groundwater constituents: Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS).

## 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 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 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?

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? No

Is additional groundwater monitoring to be conducted? Yes

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. 04/01/2026

Proposed date of completion of Reclamation. 04/01/2029

## 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. 10/10/2022

Actual Spill or Release date, or date of discovery. 02/03/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/25/2023

Proposed site investigation commencement. 11/26/2022

Proposed completion of site investigation. 12/01/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/25/2024

Proposed date of completion of Remediation. 12/31/2025

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:

The operator is requesting additional time to commence remedial activities. Remedial activities will commence on or before the date specified in the "Proposed date of completion of Remediation" section.

**OPERATOR COMMENT**

This form serves to comply with the Rule 913.e. reporting schedule. The Operator will complete the excavation as outlined in this proposed Remedial Action workplan within the date range provided in the Remedial Action Dates section of the Implementation Schedule. Excavation is scheduled for Apr. 4, 2025. Supplemental Form 27s will be prepared and submitted on a quarterly schedule to provide updates and progress of the remediation until closure criteria has been achieved.

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: 25984

**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)