

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

404082294

Receive Date:

02/05/2025

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 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<br>Phone: (970) 313-5582<br>Mobile: ( ) |
| Address: 1099 18TH STREET SUITE 1500 |                                   |   |
| City: DENVER State: CO Zip: 80202    |                                   |   |
| Contact Person: Jason Davidson       | Email: jason.davidson@chevron.com |   |

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 29770 Initial Form 27 Document #: 403396553

## 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: WELL                            | Facility ID: _____  | API #: 123-22049       | County Name: WELD                          |
| Facility Name: GREER 23-28                     | Latitude: 40.108170 | Longitude: -104.557640 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NESW                                   | Sec: 28             | Twp: 2N                | Range: 64W Meridian: 6 Sensitive Area? Yes |

  

|  |                     |                        |  |
|--|---------------------|------------------------|--|
| Facility Type: SPILL OR RELEASE                | Facility ID: 485293 | API #: _____           | County Name: WELD                          |
| Facility Name: Greer 23-28                     | Latitude: 40.108164 | Longitude: -104.557673 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NESW                                   | Sec: 28             | Twp: 2N                | Range: 64W 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? 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**

Riverine 0.17mi E  
Residence 0.22mi S  
Well located within commercial lot  
Commercial structure 0.03mi N, 0.10/0.13mi 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          | 10' x 10' x 3' bgs | Lab 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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the GREER 23-28 wellhead cut and cap and flowline removal. Approximately 2602' of flowline was abandoned-in-place as it crosses railroad and is located near active utilities near the facility pad. The associated Form 44 (Document No. 403604636) is included in the Related Forms section of this Form 27. So as to not disturb the conflicts, soil samples were only taken at the start and endpoint of the flowline where the conflicts exist. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead, and taken along the flowline, up to the point of the common trench, at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. The wellhead was cut and capped per ECMC rules.

### 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 ):

A grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken along the flowline at any points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway. 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 ):

If groundwater is encountered during the site investigation, a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters 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 of the wellhead and flowline areas 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 Flowline Closure and Wellhead Closure Checklists were utilized and filled out during the abandonment process. A photolog was submitted on the Supplemental Form 27 ECMC Document No. 403664291.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

**Soil**

Number of soil samples collected 6

Number of soil samples exceeding 915-1 6

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 100

**Groundwater**

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

**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) 70

-- Highest concentration of SAR 0.033  
7

BTEX &gt; 915-1 No

Vertical Extent &gt; 915-1 (in feet) 5

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)

**OTHER INVESTIGATION INFORMATION**☐ Were impacts to adjacent property or offsite impacts identified?☐ Were background samples collected as part of this site investigation?☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 20

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Analytical soil samples will be collected at locations FL01-01, FL01-02, FL01-06, and FL01-07, as shown on the flowline site map, which will be collected for full Table 915-1 analysis. Additionally, field screen soil samples will be collected from proposed sample locations FL01-03, FL01-04, and FL01-05. Concurrently with the flowline sampling, background samples will be collected for analysis of inorganic compounds and metals in soil per ECMC Table 915-1. All proposed flowline sample locations were selected based on the approved sampling map attached to the Form 27 Initial (ECMC Document 403396553). 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. The SSI is tentatively scheduled to be completed on April 10, 2025.

**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.

A remedial excavation was completed on May 22, 2024 to remove soil impacted with hydrocarbon compounds identified during the flowline decommissioning in soil sample FL01-A@3'. Five soil samples (FS01, and SS01-SS04) were collected from the base and sidewalls of the excavation at depths of 5 feet and 4 feet bgs, respectively, and were submitted for analysis of the Full Table 915-1 analytical suite.

Soil analytical results indicated that organic compound concentrations were in compliance with the applicable ECMC regulatory standards in all samples collected from the final excavation extent. pH, arsenic, barium, cadmium, and/or lead concentrations were in exceedance of the applicable regulatory standards in all soil sample locations.

**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.

A total of approximately 20 cubic yards of impacted material were removed for off-site disposal at the Waste Management Buffalo Ridge Landfill under signed Noble waste manifests. A total of approximately 20 cubic yards of imported clean fill was used to backfill the excavation. The final remedial excavation extent measured approximately 10 ft. by 10 ft. by 5 ft. bgs.

## Soil Remediation Summary

☐ In Situ

☒ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 20

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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 decommissioning or excavation 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 1Q2025 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? 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. 09/26/2023

Proposed date of completion of Reclamation. 09/18/2026

## 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. 03/29/2023

Actual Spill or Release date, or date of discovery. 10/13/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/21/2023

Proposed site investigation commencement. 04/10/2025

Proposed completion of site investigation. 04/17/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/17/2025

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:

Proposed completion of site investigation date is being updated to reflect the schedule to complete the supplemental site investigation. The ECMC will be updated on a subsequent Form 27 with the results of the supplemental site investigation, or if the schedule is changed due to site access constraints. The SSI is tentatively scheduled to be completed on April 10, 2025.

## OPERATOR COMMENT

This Form 27 is being submitted as the first quarter 2025 timeline update for the scheduled supplemental site investigation at the Greer 23-28 flowline location.

Analytical soil samples will be collected at locations FL01-01, FL01-02, FL01-06, and FL01-07 shown on the flowline site map, which will be collected for full Table 915-1 analysis. Additionally, field screen soil samples will be collected from proposed sample locations FL01-03, FL01-04, and FL01-05. Concurrently with the flowline sampling, background samples will be collected for analysis of inorganic compounds and metals in soil per ECMC Table 915-1. All proposed flowline sample locations were selected based on the approved sampling map attached to the Form 27 Initial (ECMC Document 403396553). 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. The SSI is tentatively scheduled to be completed on April 10, 2025.

As noted in the pending ECMC Document No. 404030673, this form is being submitted to reset the 90-day reporting period and evenly distribute the reporting requirement across the entire quarter.

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: 02/05/2025

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: 03/24/2025

Remediation Project Number: 29770

## 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. |
|        | Pursuant to Rule 913.d, Operator shall adhere to the proposed schedule. Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule at least 14 days in advance of any schedule changes.   |
| 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

|           |   |
|-----------|---|
| 404082294 | INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL) |
| 404082379 | SITE INVESTIGATION PLAN                           |
| 404138133 | FORM 27-SUPPLEMENTAL-SUBMITTED                    |

Total Attach: 3 Files

## General Comments

## User Group

## Comment

## Comment Date

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)