

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Taylor Robinson

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		Mobile: ()
Contact Person: Dan Peterson	Email: RBUEUF27@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32763 Initial Form 27 Document #: 403582549

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 #: 123-26973	County Name: WELD
Facility Name: BERNHARDT J 31-33D	Latitude: 40.350238	Longitude: -104.829068	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSW	Sec: 31	Twp: 5N	Range: 66W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 486996	API #: _____	County Name: WELD
Facility Name: Bernhardt J #31-33D	Latitude: 40.350181	Longitude: -104.828982	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSW	Sec: 31	Twp: 5N	Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 486997 API #: _____ County Name: WELD
Facility Name: Bernhardt J #31-33D Latitude: 40.349066 Longitude: -104.829019
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: SWSW Sec: 31 Twp: 5N Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 486998 API #: _____ County Name: WELD
Facility Name: Bernhardt J #31-33D Latitude: 40.350008 Longitude: -104.828984
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: SWSW Sec: 31 Twp: 5N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Cropland
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 0.13mi SW, 0.10/0.24mi W, 0.20mi NW
Freshwater Pond 0.10/0.11/0.24mi SW

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
No	GROUNDWATER	NA	Not encountered
Yes	SOILS	TBD	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 BERNHARDT J31-33D wellhead cut and cap and flowline removal. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Approximately 677' of flowline was removed. 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.

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):

Previously, nine (9) grab soil samples were collected at the wellhead excavation (1), the flowline terminus at the wellhead (2), the flowline terminus at the separator (1), and along the flowline path (5). Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, metals, 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):

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 0

-- Highest concentration of TPH (mg/kg) 129

Number of soil samples exceeding 915-1 0 -- Highest concentration of SAR 2.82

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

Approximate areal extent (square feet) 280 Vertical Extent > 915-1 (in feet) 4

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?

Previously, three (3) background samples were collected near the flowline path for EC, SAR, pH, boron, and ECMC Table 915-1 metals analysis. Seven (7) background samples were collected near the wellhead for arsenic, barium, lead, selenium, and pH analysis.

Additional backgrounds (5+) will be collected from soil of native/similar lithologic material not impacted by oil and gas activity to further compare EC, SAR, pH, boron, and ECMC Table 915-1 metals, as needed.

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.

No current source was generated. Residual petroleum hydrocarbon impacts identified along the flowline path will be removed through excavation. Soil samples will be collected for full ECMC Table 915-1 analysis.

Additional backgrounds (5+) will be collected from soil of native/similar lithologic material not impacted by oil and gas activity to further compare EC, SAR, pH, boron, and ECMC Table 915-1 metals, as needed. Remediation of elevated arsenic, barium, cadmium, lead, selenium, and pH identified outside of the release points will be discussed on a supplemental Form 27 as applicable.

REMEDICATION 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.

Source excavation activities are tentatively scheduled to be started at the site by the fourth quarter of 2024, pending landowner consultation. NFA will be considered when soil and/or groundwater (if encountered) concentrations are in compliance with ECMC Table 915-1 standards.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

____ Chemical oxidation
____ Air sparge / Soil vapor extraction
____ Natural Attenuation
____ Other _____

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.

If groundwater is encountered during remediation activities a grab groundwater will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1. Additional monitoring will be proposed in a supplemental 27, as needed.

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 Quarterly Notification 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.

Operator anticipates the remaining cost for this project to be: \$ 80000 _____

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. Residual pH identified at the former wellhead will be confirmed as still present, and previous values will be laterally and vertically defined. If residual pH is observed, is delineated, and is to remain in place, a detailed reclamation plan will be provided in a supplemental Form 27 as applicable.

Is the described reclamation complete? No

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. 04/10/2024

Proposed date of completion of Reclamation. 10/31/2028

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. 10/19/2023

Actual Spill or Release date, or date of discovery. 04/23/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/07/2024

Proposed site investigation commencement. 09/27/2025

Proposed completion of site investigation. 12/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/01/2026

Proposed date of completion of Remediation. 06/30/2026

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 to reflect the planned remediation to address the historical release identified along the flowline path.

OPERATOR COMMENT

Chevron will be conducting a full project and data analysis of information since the start of work activities for this project. ECMC will be updated on a supplemental form 27 with proposed plan.

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

Signed: Sahithi Rondla

Title: Environmental Scientist

Submit Date: 03/28/2025

Email: cvxform27@erm.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: 32763

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**

404143410	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

User Group	Comment	Comment Date
Environmental	In accordance with 913.d.(1), Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.	04/01/2025
Environmental	Reduced analyte sampling is not approved. Operator shall sample for full Table 915-1.	04/01/2025
Environmental	This is the 2nd denial for the same or similar issues related to reporting on this project number.	04/01/2025
Environmental	ECMC will not approve additional forms until the missing information is provided.	04/01/2025
Environmental	ECMC has denied this Form 27 due to discrepancies in analytical data associated with the Remediation project. Operator will submit a replacement Form 27 for this project that includes the following components: - A statement from the Operator indicating that this project is included in the data integrity review; - A site-specific description describing any data anomalies in the project record; - The original, correct laboratory analytical report as a stand-alone attachment; and - A Form 19 Document ID as a Related Document, if necessary to report a Spill or Release.	04/01/2025

Total: 5 comment(s)