

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
404040155  
Receive Date:  
01/21/2025

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 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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	<b>Phone Numbers</b>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>RBUEUF27@chevron.com</u>	Phone: <u>(970) 939-1929</u>
		Mobile: <u>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22738 Initial Form 27 Document #: 403006052

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: <u>LOCATION</u>	Facility ID: <u>329775</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UPRC-64N67W 23NENW</u>	Latitude: <u>40.302666</u>	Longitude: <u>-104.859923</u>	
	** correct Lat/Long if needed: Latitude: <u>40.304722</u>	Longitude: <u>-104.867188</u>	
QtrQtr: <u>NENW</u>	Sec: <u>23</u>	Twp: <u>4N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>482464</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UPRC T4N-R67W-S23 Tank Battery</u>	Latitude: <u>40.304673</u>	Longitude: <u>-104.867302</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>23</u>	Twp: <u>4N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## **SITE CONDITIONS**

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Crop Land

Is domestic water well within 1/4 mile? No

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**

Farm Structures 0.24mi W

# 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	20'x20'x10'	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.

A site investigation was conducted pursuant to ECMC Rule 911 at the UPRC T4N-R67W-S23 L01 Tank Battery location.

Four (4) grab confirmation soil samples were collected from the produced water vessel excavation (2), beneath the ground oil tank (1), and at the separator (1). Soil samples were analyzed by a certified laboratory for ECMC Table 915-1 compounds, EC, SAR, pH, and boron. One (1) waste characterization sample for ECMC Table 915-1 metals was collected. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

## 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 ):

### 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)     504.7      
    25

Number of soil samples exceeding 915-1 10 -- Highest concentration of SAR 0.448  
 Was the areal and vertical extent of soil contamination delineated? Yes            BTEX > 915-1 No  
 Approximate areal extent (square feet) 400 Vertical Extent > 915-1 (in feet) 10

**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?  
 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?  
 Operator is conducting a thorough review of the Site. Groundwater has not been encountered or expected within 20 feet of the ground surface. Therefore, comparison of soil to Protection of Groundwater does not seem applicable. Additional delineation and/or background sampling will be proposed, if needed.

**REMEDIAL ACTION PLAN**

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

The source was delineated through a subsurface assessment, in accordance with approved Form 27 Doc. # 403202600. Results of the subsurface assessment were provided on supplemental Form 27 Doc. # 403445684. Groundwater was not encountered during the assessment and drilling activities hit refusal at 12.5'. In the absence of nearby recorded static water level in water wells, a nearby subsurface assessment site, in which groundwater was not encountered, is being used as a reference, see Form 27 Doc. # 403922410 (Rem # 29552). The absence of groundwater suggests that a pathway to groundwater at this location is not likely. Therefore, Operator proposes to use ECMC Table 915-1 Residential Soil Screening Levels at the site, and Protection of Groundwater Standards (GSSLs) are not applicable.

Residual petroleum hydrocarbon impacts identified at the site were removed through excavation. Soil samples were collected for analysis of TPH C6-36, Table 915-1 organics in soil, pH, and ECMC Table 915-1 metals, per supplemental Form 27 Doc. # 403445684. Soil samples were collected to confirm the vertical and lateral extents of the impacts following source removal.

Results of the excavation/confirmation sampling indicate that all current organic concentrations are in compliance with ECMC Table 915-1 regulatory limits. Residual pH, arsenic, and barium are consistent with background comparison. Residual selenium exceeds Protection of Groundwater Soil Screening Levels (GSSLs) in soil at the site and in backgrounds. GSSLs do not appear applicable at the site, therefore, residual metals at the site do not appear to require additional assessment or remediation.

**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.

Results of the excavation/confirmation sampling indicate that residual petroleum hydrocarbon impacts have been vertically and laterally defined. Operator proposes to use ECMC Table 915-1 Residential Soil Screening Levels at the site.

## Soil Remediation Summary

In Situ

Ex Situ

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

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

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

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 150

\_\_\_\_\_ 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 the assessment. The absence of groundwater suggests that a pathway to groundwater at this location is not likely.

# 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 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: \$ 10000

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 150

E&P waste (solid) description E&P solid waste derived from excavation activities.

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: Waste Management (Ault)

Volume of E&P Waste (liquid) in barrels 0

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 is consistent with background comparison and does not appear to require additional assessment or remediation.

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. 06/09/2022

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. 03/01/2022

Actual Spill or Release date, or date of discovery. 06/27/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/09/2022

Proposed site investigation commencement. 06/09/2022

Proposed completion of site investigation. 06/30/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/09/2022

Proposed date of completion of Remediation. 06/30/2025

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:

\_\_\_\_\_

**OPERATOR COMMENT**

This form serves as a quarterly update.

Operator is conducting a thorough review of the Site and will address any COAs. Groundwater has not been encountered or expected within 20 feet of the ground surface. Therefore, comparison of soil to Protection of Groundwater does not seem applicable. Additional delineation and/or background sampling will be proposed, if needed.

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

Signed: William Schoff

Title: Environmental Consultant

Submit Date: 01/21/2025

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: Taylor Robinson

Date: 04/15/2025

Remediation Project Number: 22738

**COA Type****Description**

	Operator state's "Groundwater has not been encountered or expected within 20 feet of the ground surface". Operator to provide further explanation/data for how they came to this conclusion.
	Operator to adhere to all previous COAs listed in Doc#' s 403202600, 403445684, and 403928346.
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**

404040155	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404165714	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

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

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

Total: 0 comment(s)