

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404169373

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: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(303) 597-6847</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Phillip Porter</u>	Email: <u>Phillip.Porter@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30294 Initial Form 27 Document #: 403420243

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>WELL</u>	Facility ID: _____	API #: <u>123-38670</u>	County Name: <u>WELD</u>
Facility Name: <u>Wells Ranch AA35-62-1AHNC</u>	Latitude: <u>40.437499</u>	Longitude: <u>-104.394114</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>36</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485882</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Wells Ranch AA35-62-1AHNC</u>	Latitude: <u>40.437499</u>	Longitude: <u>-104.394114</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>36</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Grassland

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

NA

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
UNDETERMINED	GROUNDWATER	NA	Lab analysis if encountered
Yes	SOILS	~6'x6'x4'	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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the Wells Ranch AA35-62-1AHNC wellhead cut and cap and flowline abandonment. The wellhead was cut and capped per ECMC rules. Approximately 2017' of flowline was abandoned-in-place as per doc #403778105. This flowline lies in a common trench with at least one other line. So as to not disturb the other line(s) sharing the common trench, soil samples were only be taken at the wellhead and at the endpoint of the flowline. The ECMC will be updated in a supplemental Form 27 if a portion of the flowline is able to be removed

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):

Five (5) grab soil samples were collected from the subsurface on the N-E-S-W sides of the wellhead outside of the casing collar (4), and from pea gravel/loose material at the based of the excavation inside of the casing collar. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (C6-C36), organic compounds in soil per ECMC Table 915-1, EC, SAR, pH metals, and boron.

Soil samples will be collected at the start/end points of the flowline. Soil samples will be analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (C6C36), organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, metals, and boron. All samples collected were/will be 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 or remediation activities, a grab groundwater will be collected and analyzed for all organic compounds 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 flowline areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 19

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 100

NA / ND

-- Highest concentration of TPH (mg/kg) 147.5
8

-- Highest concentration of SAR 1.6

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 4

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?

A background sample was collected from native, off-pad soil near the wellhead for EC, SAR, pH, boron, and ECMC Table 915-1 metals analysis. Additional backgrounds (27) were collected from native soil of similar lithologic material and intervals to further compare residual arsenic and barium.

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?

As part of Chevrans Data Integrity review for projects associated with Eagle Environmental, all point of compliance samples will be recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. Additionally, a Supplemental Site Investigation (SSI) will be completed to resample SB01-SB05 which were sampled by Eagle Environmental on 08/06/2024 for Full Table 915 analysis. Sample results will be reported in a subsequent Form 27.

The organic and inorganic compound exceedances identified during decommissioning at WH-FS-01@4' will be removed through a remedial excavation and the impacted soil will be segregated for proper offsite disposal. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The results of which will be submitted on a subsequent Form 27.

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 and inorganic compound exceedances identified during decommissioning at WH-FS-01@4' will be removed through a remedial excavation and the impacted soil will be segregated for proper offsite disposal. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The results of which will be submitted on a subsequent Form 27.

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.

As part of Chevrans Data Integrity review for projects associated with Eagle Environmental, all point of compliance samples will be recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. Additionally, a Supplemental Site Investigation (SSI) will be completed to resample SB01-SB05 which were sampled by Eagle Environmental on 08/06/2024 for Full Table 915 analysis. Sample results will be reported in a subsequent Form 27.

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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.

Groundwater was not encountered during the subsurface assessment.

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 and Supplemental Site Investigation Proposal _____

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 MWZZ316714 and MWZX316724) 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? 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.

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. 01/03/2024

Proposed date of completion of Reclamation. 09/30/2026

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. 05/16/2023

Actual Spill or Release date, or date of discovery. 01/16/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/03/2024

Proposed site investigation commencement. 07/01/2023

Proposed completion of site investigation. 09/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/30/2025

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:

The implementation schedule has been changed due to the decommissioning of the former Wells Ranch AA35-62-1AHNC wellhead and flowline and necessity for supplemental site investigation (SSI) and remedial excavation activities adjacent to the wellhead. The proposed supplemental site investigation (SSI) and remedial excavation will be completed following the approval of this form.

OPERATOR COMMENT

This form has been submitted to provide a 2Q 2025 update for the Wells Ranch AA35-62-1AHNC wellhead and flowline (Rem #30294). Remediation and site investigation, previously directed by Fremont Environmental Inc (Fremont) and Eagle Environmental Consulting Inc (Eagle), is now under the direction of Montrose Environmental (Montrose).

Due to a clerical error the details of this project were reported under another approved Form 27, document number 404134969 (REM #30348). A supplemental Form 27 will be submitted for REM #30348 with updated information in order to address this error.

As part of Chevrans Data Integrity review for projects associated with Eagle Environmental, all point of compliance samples will be recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1. Additionally, a Supplemental Site Investigation (SSI) will be completed to resample SB01-SB05 which were sampled by Eagle Environmental on 08/06/2024 for Full Table 915 analysis. Sample results will be reported in a subsequent Form 27.

The organic and inorganic compound exceedances identified during decommissioning at WH-FS-01@4' will be removed through a remedial excavation and the impacted soil will be segregated for proper offsite disposal. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The results of which will be submitted on a subsequent Form 27.

In response to ECMC Form 27 Comment dated February 13, 2025, (Document Number 404061154), Operator is submitting a replacement Form 27. Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical reports from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original reports with additional protections (Reissued Reports). The Reissued Reports were received directly from the lab on February 13 and March 31, 2025, which includes a watermark confirming both the laboratory representative who reissued the reports and the date and time of the reissuance for the Origins Laboratory Reports, and the application of a Digital ID/Verified Certification (lock) to support reissuance for the Summit Scientific Laboratory Reports. The metadata associated with this Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Reports are attached to this submission.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information responsive to ECMC's general comments responding to Operator's Form 27 submission found in Document Number 404061154.

In accordance with the comment provided via the denied Form 27, document number 404061154, Montrose has conducted a review of the previously submitted laboratory report(s) to the re-issued (i.e., encrypted) laboratory report(s), which included a thorough review of the analytical results, including cross-checking reports against the previously submitted site investigation reports, tables, form text, and figures. No discrepancies were found.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the remedial excavation confirmation soil samples and SSI will be submitted on a subsequent Form 27.

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

Signed: Scott Williamson

Title: Environmental Consultant

Submit Date: _____

Email: scottwilliamson@montrose-env.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: 30294

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

404175824	ANALYTICAL RESULTS
404175825	ANALYTICAL RESULTS
404175826	ANALYTICAL RESULTS
404175827	ANALYTICAL RESULTS
404175829	ANALYTICAL RESULTS
404175865	OTHER
404175882	OTHER

Total Attach: 8 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)