

State of Colorado
Energy & Carbon Management Commission

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403991929
Receive Date:
04/03/2025

Report taken by:
Alexander Ahmadian

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>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Dan Peterson</u>	Email: <u>danpeterson@chevron.com</u>	Phone: <u>(970) 730-7281</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27477 Initial Form 27 Document #: 403200978

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>123-21114</u>	County Name: <u>WELD</u>
Facility Name: <u>LAZY 15-8</u>	Latitude: <u>40.148838</u>	Longitude: <u>-104.571363</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>8</u>	Twp: <u>2N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>331680</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>LAZY-62N64W 8SWSE</u>	Latitude: <u>40.148838</u>	Longitude: <u>-104.571363</u>	
** correct Lat/Long if needed: Latitude: <u>40.148718</u>		Longitude: <u>-104.571763</u>	
QtrQtr: <u>SWSE</u>	Sec: <u>8</u>	Twp: <u>2N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Rangeland _____

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 Pond 0.20mi NW
Riverine 0.09mi 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
UNDETERMINED	GROUNDWATER	NA	Lab Analysis or Field Screening, if encountered.
Yes	SOILS	Refer to ECMC Document #403506590	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 Lazy 15-8 wellhead cut and cap and flowline removal. On 4/17/2023, the wellhead was cut and capped per ECMC rules. Approximately 122' of flowline was removed on 06/14/2023. The related Form 44 document # is 403486966. Soil samples were collected 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, AS APPLICABLE to abandonment type. The Flowline Pre-Abandonment Notice Document number is included under Related Forms.

A site investigation was conducted pursuant to ECMC Rule 911 at the LAZY T2N-R64W-S8 L01 Tank Battery location on 06/14/2023.

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. Grab confirmation soil samples were collected from the produced water vessel excavation (FS01@5' & SS02@2.5'), beneath the above ground oil tank (AST01@0.5'), and at the risers for separator flowline (SEP01-FL@3') and dumplines (SEP01-DL@2' & SEP02-DL@2'). 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, 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, grab groundwater samples will be collected and analyzed for all organic and inorganic 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 tank battery and flowline areas occurred during decommissioning activities and removal. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. A detailed summary of the tank battery and flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results was attached to a previous Form 27 (ECMC Document #403506590). A detailed summary of wellhead cut and cap activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

A supplemental site investigation (SSI) was conducted on 4/12/2024 to delineate impacted media. A secured analytical data report is pending. Upon receipt of a secured report, analytical findings will be summarized and provided, and an SSI will be proposed, as applicable, on a subsequent Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 25

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 100

NA / ND

ND Highest concentration of TPH (mg/kg) _____

NA Highest concentration of SAR _____

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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?

Fifteen background soil samples were collected near the tank battery and analyzed for pH. Background soil samples were collected from depths ranging between 2 to 6 feet below ground surface (ft bgs). During decommissioning, soil type was generally classified as well graded sands. However, during the supplemental site investigation (SSI), detailed observations of the soil via boring logs found the lithology to be silty sands. The maximum background concentrations for pH was observed to be 8.65. All pH concentrations observed during decommissioning and supplemental site investigation (SSI) activities were below background levels.

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?

A supplemental site investigation (SSI) was conducted on 4/12/2024 to delineate impacted media. A secured analytical data report is attached. A detailed summary of the SSI is presented in the Remediation Summary section of this Form 27.

Additional site investigation activities will be conducted to resample the locations sampled during the 4/12/2024 SSI (BH01-BH10), 04/17/2023 wellhead cut and cap activities (WH-FS-01@6'), and 06/14/2023 decommissioning activities (AST01@0.5', FS01@5', SEP01-DL@2', SEP01-FL@3', SEP02-DL@2', and SS02@2.5') for the full ECMC Table 915-1 suite.

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.

Refer to the remediation summary section below.

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.

A Site Assessment was conducted on 4/12/2024 to delineate impacted media. Ten soil borings were advanced in the area of impacts. BH01 was advanced at the same location as the soil sample FS01@5' to vertically delineate impacts at that location. BH02-BH05 were advanced surrounding BH01 to vertically and laterally delineate impacts identified at FS01@5'. BH06 was advanced at the same location as the soil sample SEP01-FL@3' to vertically delineate impacts at that location. BH07-BH10 were advanced surrounding BH06 to vertically and laterally delineate impacts identified at SEP01-FL@3'. Soil samples were collected and analyzed for pH. Groundwater was not encountered during this assessment. Soil boring samples BH01@5-6' and BH06@2-3' were collected from the same locations as waste characterization samples FS01@5' and SEP01-FL@3', respectively. The pH exceedances identified during decommissioning at FS01@5' and SEP01-FL@3' were not repeated by resample locations BH01@5-6' and BH06@2-3'.

Additional site investigation activities will be conducted to resample the locations sampled during the 4/12/2024 SSI (BH01-BH10), 04/17/2023 wellhead cut and cap activities (WH-FS-01@6'), and 06/14/2023 decommissioning activities (AST01@0.5', FS01@5', SEP01-DL@2', SEP01-FL@3', SEP02-DL@2', and SS02@2.5') for the full ECMC Table 915-1 suite.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ 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 flowline decommissioning, wellhead cut and cap, or site investigation 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 SSI Report, SSIP _____

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. 04/17/2023

Proposed date of completion of Reclamation. 06/30/2027

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. 12/27/2022

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/17/2023

Proposed site investigation commencement. 04/03/2025

Proposed completion of site investigation. 10/03/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/03/2025

Proposed date of completion of Remediation. 04/03/2026

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:

Additional site investigation activities will be conducted to resample the locations sampled during the 4/12/2024 SSI (BH01-BH10), 04/17/2023 wellhead cut and cap activities (WH-FS-01@6'), and 06/14/2023 decommissioning activities (AST01@0.5', FS01@5', SEP01-DL@2', SEP01-FL@3', SEP02-DL@2', and SS02@2.5') for the full ECMC Table 915-1 suite. The proposed site investigation will be completed following approval of this form.

OPERATOR COMMENT

This Form 27 is also being submitted to include the supplemental site investigation (SSI) results for the former Lazy 15-8 Tank Battery location. A comprehensive data packet summarizing the SSI activities is attached to this Form 27, and a detailed summary of the SSI activities is presented in the Remedial Action Plan sections and below.

The previous two Supplemental Form 27s (ECMC Document #s 403866551 and 403769247) were submitted on 08/23/2024 and 10/16/2024, respectively, and denied for providing duplicative information. The operator was directed to evaluate the form and consolidate the work into a single cohesive remediation plan. This form (ECMC Document #403991929) provides a single workplan for the April 2023 wellhead cut and cap and April 2024 SSI originally submitted within those forms.

In response to ECMC Form 27 Comment dated January 28, 2025, on this returned to draft Form, Operator is re-submitting this Form. 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 labs protect the laboratory analytical reports from subsequent unauthorized modification by anyone outside the lab, which resulted in the labs reissuing the original reports with additional protections (Reissued Reports). The Reissued Reports were received directly from the lab on February 13, 2025 (Origins) and April 3, 2025 (Summit Scientific), which includes a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance the application of a Digital ID/Verified Certification (lock) to support reissuance, respectively. The metadata associated with these Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the reports, 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.

The WH sampling was conducted by Eagle Environmental in April 2023 and identified no organic or inorganic exceedances. A secured analytical data report is attached and data summarized in the attached Eagle data package.

A supplemental site investigation (SSI) was conducted on 4/12/2024 to delineate impacted media. Soil samples were analyzed for pH during the SSI. A secured analytical data report is attached.

Additional site investigation activities will be conducted to resample the locations sampled during the 4/12/2024 SSI (BH01-BH10), 04/17/2023 wellhead cut and cap activities (WH-FS-01@6'), and 06/14/2023 decommissioning activities (AST01@0.5', FS01@5', SEP01-DL@2', SEP01-FL@3', SEP02-DL@2', and SS02@2.5') for the full ECMC Table 915-1 suite. A proposed soil boring locations map is attached to this Form.

The results of the SSI will be submitted on a subsequent Form 27. Quarterly reporting will continue until closure criteria are achieved for the remediation project.

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

Signed: Allan Engelhardt

Title: Environmental Consultant

Submit Date: 04/03/2025

Email: tas-chevron-3@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: Alexander Ahmadian

Date: 07/07/2025

Remediation Project Number: 27477

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

403991929	FORM 27-SUPPLEMENTAL-SUBMITTED
404079312	SITE INVESTIGATION REPORT
404128156	ANALYTICAL RESULTS
404147452	SITE INVESTIGATION PLAN
404151913	ANALYTICAL RESULTS
404151964	SITE INVESTIGATION REPORT

Total Attach: 6 Files

General Comments

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

Total: 0 comment(s)