

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404279350

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 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>	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>Erica Zuniga</u>	Email: <u>EricaZuniga@chevron.com</u>	Phone: <u>(970) 278-6934</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 26176 Initial Form 27 Document #: 403196484

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

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-20684</u>	County Name: <u>WELD</u>
Facility Name: <u>PARKER 29-34</u>	Latitude: <u>40.104950</u>	Longitude: <u>-104.573210</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>29</u>	Twps: <u>2N</u>	Range: <u>64W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications SW 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

Riverine 0.20/0.21mi NE
Residential 0.19mi SW
Farm Structure 0.19/0.21mi 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 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	Not Impacted	Lab analysis and Field Screening if Encountered
No	SOILS	Not Impacted	Lab analysis and Field Screening if Encountered

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 PARKER 29-34 wellhead cut and cap and flowline removal. Approximately 3075' of flowline was removed. The wellhead was cut and capped per ECMC rules.

In January 2023 one soil sample was collected from the base of the wellhead excavation, and soil samples were screened on the N-E-S-W sides and the base of the wellhead excavation. The soil sampling results from the wellhead did not reveal petroleum hydrocarbon or SSR exceedances. Metals were not analyzed on this sample. The results of this investigation were submitted with supplemental form 27 Doc.#404144132.

In April 2023 four soil samples were collected during the flowline abandonment activities from the flowline terminus at the wellhead and the separator, as well as at changes of direction in the flowline. In addition, soils were screened along the flowline at approximately 250-foot intervals. The soil sampling results did not reveal petroleum hydrocarbon or SSR exceedances. Metals were not analyzed on these samples. The validated lab results from this investigation are attached to this supplemental form 27, as requested via COA provided with supplemental form 27 Doc.#404020869.

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):

Confirmation soil sampling is recommended at the previous sample locations at the wellhead and the flowline. At the wellhead five soil samples will be collected from five hand auger borings. One boring will be collected at the base of the former wellhead excavation at 6 feet bgs, and four samples will be collected five feet away from the former wellhead location in each cardinal direction (N, S, E, W) at 5 feet bgs. Four soil samples will be collected from four auger borings at the previous flowline locations where soil samples were collected and submitted for laboratory analysis. Sample depths range from 3.5 feet bgs to 5 feet bgs and are depicted on attached proposed sample location figures. Samples will be field screened and analyzed for the full extend of Table 915-1 compounds.

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 will be collected and analyzed for all groundwater 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):

Background soil samples will be obtained in native, undisturbed areas sufficiently away from the operations boundary and investigation area impacted by oil and gas activity. Soil samples will be collected from similar depths and lithologic materials for comparison to confirmation soil sample results. Background samples will be analyzed for ECMC Table 915-1 SSR parameters and metals.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5

Number of soil samples exceeding 915-1 0

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

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 3.97

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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 _____

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?

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?

Confirmation sampling is proposed as described in the Site Investigation Plan at the locations depicted on the attached soil sample location maps to verify the findings of the initial wellhead and flowline abandonment investigations.

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 source was generated

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.

NA

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ 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.

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 COGCC 1000 Series Rules.

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 04/13/2023

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. 09/26/2022

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/10/2023

Proposed site investigation commencement. 11/15/2022

Proposed completion of site investigation. 12/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2025

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:

OPERATOR COMMENT

This submittal serves as a replacement supplemental form 27 for the PARKER 29-34 (REM 26176) site wellhead cut and cap and flowline abandonment activities. In response to ECMC Form 27 Comment dated 07/07/2025 (Document Number 404242136), the operator is submitting this replacement supplemental form 27. The ECMC denied the form as justification wasn't provided for a change in the site investigation completion date. The site was under a robust data and integrity review and there were delays in receiving the updated, encrypted lab reports (reissued reports) from one of the laboratories in order to finish the review. Upon receipt and review of the reissued reports, it was determined additional closure and background sampling was required to fulfill the NFA request. The proposed sampling is in the process of being scheduled. The implementation schedule has been updated to allow for additional confirmation and background soil sampling activities to be completed at the Parker 29-34 wellhead and flowline. The proposed site investigation will be completed following approval of this form. Operator will notify and provide an updated timeline to ECMC on a subsequent form submittal should the proposed activities become delayed beyond the estimated schedule.

Initial wellhead sampling was conducted in January 2023 and did not identify ECMC Table 915-1 exceedances of VOCs, SVOCs, or SSR; however, metals were not analyzed. The results of this investigation were submitted with supplemental form 27 Doc.#404144132. The validated lab report from this investigation is attached to this supplemental form 27.

In April 2023, sampling was conducted during flowline abandonment activities. No exceedances of ECMC Table 915-1 VOCs, SVOCs or SSR were identified in soil samples collected from the flowline; however, metals were not analyzed. In response to ECMC Form 27 Comment dated 02/17/2025 (Doc. #404020869), the Operator is submitting the data attached to this supplemental 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 report from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original report with additional protections (Reissued Report). The Reissued Report was received directly from the lab on 04/15/2025, which includes the application of a Digital ID/Verified Certification (lock) to support reissuance. The metadata associated with this Reissued Report 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 Report is attached to this submission.

Based upon these results, further supplemental site investigation activities will be conducted to delineate ECMC metals at the former PARKER 29-34 wellhead and flowline locations. The findings of this assessment, as well as any additional actions required, will be provided in subsequent Supplemental Form 27 submittals.

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.

Pursuant to Rule 913.e, quarterly reporting will continue for the location until data indicates no further action is warranted.

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

Signed: Michael LeFrancois _____

Title: Environmental Consultant _____

Submit Date: _____

Email: michael.lefrancois@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: 26176 _____

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

404279462	SOIL SAMPLE LOCATION MAP
404279468	SOIL SAMPLE LOCATION MAP
404279672	SITE INVESTIGATION REPORT
404279681	LABORATORY ANALYTICAL REPORT
404279683	LABORATORY ANALYTICAL REPORT

Total Attach: 5 Files

General Comments

User Group

Comment

Comment Date

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

Total: 0 comment(s)