

State of Colorado
Energy & Carbon Management Commission

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



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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: 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: danpeterson@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 31728 Initial Form 27 Document #: 403506710

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: LOCATION	Facility ID: 328418	API #: _____	County Name: WELD
Facility Name: GOLLNER-64N67W 27NWNE	Latitude: 40.289467	Longitude: -104.874976	
** correct Lat/Long if needed: Latitude: 40.288843		Longitude: -104.871761	
QtrQtr: NWNE	Sec: 27	Twp: 4N	Range: 67W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 487577	API #: _____	County Name: WELD
Facility Name: GOLLNER-64N67W 27NWNE	Latitude: 40.288625	Longitude: -104.871700	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 27	Twp: 4N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Cropland _____

Is domestic water well within 1/4 mile? Yes _____

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

Bald Eagle Roost Site
No other potential receptors are located within 1/4 mile of the Site.

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	30'x40'x7' Deep	Field Screening and 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 GOLLNER T4N-R67W-S27 L02 Facility and Tank Battery location.

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):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), and at the risers for the flowline(s) and dumpline(s) of any separator(s). Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and 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):

If groundwater is encountered during the site investigation a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters 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 area occurred during abandonment activities. Field personnel field screened all disturbed areas using a PID, visual, and olfactory senses to determine if laboratory confirmation sampling was required. The ECMC Tank Battery and Produced Water Vessel Closure Checklists were utilized and filled out during the abandonment process. A photolog was attached.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>10</u>	-- Highest concentration of TPH (mg/kg) <u>2430</u>

Number of soil samples exceeding 915-1 5 -- Highest concentration of SAR 1.18

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

Approximate areal extent (square feet) 500 Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? Yes 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?

A total of 39 background soil samples were collected from an area that has not been impacted by oil and gas development. The samples were obtained at similar depths and from lithologies comparable to those of the confirmation soil samples collected at the site. These background samples were analyzed for the metals and SSR (Soil Screening Level) constituents outlined in Table 915-1. The analytical results of the background soil samples revealed elevated concentrations of pH, electrical conductivity (EC), Boron (B), Arsenic (As), Barium (Ba), Cadmium (Cd), Lead (Pb), and Selenium (Se).

Background Soil Sample Analysis (mg/kg)

pH: Max = 9.23
EC: Max = 4.89
B: Max = 2.28
As: Max*1.25 = 54.7
Ba: Max*1.25 = 535
Cd: Max*1.25 = 0.418
Pb: Max*1.25 = 31.6
Se: Max*1.25 = 0.404

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? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soil observed at sample locations PWV E-4FT and PWV B-5FT will be removed through a remedial excavation. Remedial excavation confirmation soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. The impacted soil will be disposed of at an approved landfill as non-hazardous waste in accordance with Rules 905 and 906. Copies of the waste manifests will be available upon request.

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.

Laboratory analytical results indicated a historical release had occurred at the location of soil samples PWV E-4FT and PWV B-5FT, and was reported as a historic release in Form 19 document number 403862064. A site investigation was completed 3/17/2025. Ten soil samples were collected to delineate the horizontal and vertical extent of soil impacts at the location. The proposed excavation extent measures 30'x40'x7' deep and is illustrated on the attached proposed Remedial Action Plan Map. Groundwater was not encountered during decommissioning and site investigation activities.

The source will be excavated and confirmation soil samples will be collected and analyzed for the full Table 915-1 suite of analytes.

If groundwater is encountered during the excavation of impacted soil, a groundwater sample will be collected for Table 915-1 organic and inorganic constituents in groundwater (Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS). Should no additional active remediation be required following source removal at the location, a no further action (NFA) determination will be requested within 90 days following laboratory confirmation of the removal of impacted soils with respect to the applicable Table 915-1 screening levels at the site.

If groundwater impacts are observed, an NFA will be requested once four consecutive quarters of groundwater sampling have been completed and reported at the location with concentrations of Table 915-1 constituents below regulatory limits. As needed, soil and/or groundwater remediation plans will be developed and submitted to ECMC in a supplemental Form 27.

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.

If groundwater is encountered during additional site assessment activities, a grab groundwater sample will be collected and analyzed for all organic compounds and inorganic parameters per Table 915-1.

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 Supplemental Site Investigation Submittal and Source Mass Removal 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. 10/31/2025

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. 08/23/2023

Actual Spill or Release date, or date of discovery. 07/22/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/10/2024

Proposed site investigation commencement. 11/25/2024

Proposed completion of site investigation. 03/17/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/17/2025

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 "Proposed Completion of Site Investigation" section has been updated to reflect the actual date of completion for the supplemental site investigation activities. Similarly, the "Proposed Date of Completion of Remediation" section has been revised to include the proposed date for the completion of remedial excavation activities. The proposed remedial excavation will be carried out upon approval of this form.

OPERATOR COMMENT

This Form 27 is being submitted for the former GOLLNER T4N-R67W-S27 L02 tank battery location. The submission includes decommissioning activities, supplemental site investigation results, and a proposal for remedial source mass removal.

Laboratory analytical results indicated that a historical release occurred at the location of soil samples PWV E-4FT and PWV B-5FT, which was previously reported as a historic release in Form 19 (document number 403862064). To further assess the extent of the release, a supplemental site investigation was conducted on 3/17/2025, during which ten soil samples were collected to delineate both the horizontal and vertical extent of soil impacts. Based on these findings, a proposed excavation plan has been developed, with the excavation extent measuring 30'x40'x7' deep, as illustrated in the attached proposed Remedial Action Plan Map.

Groundwater was not encountered during the decommissioning or site investigation activities. As part of the remediation process, the impacted source will be excavated, and confirmation soil samples will be collected for analysis. These samples will be analyzed for the full suite of analytes as outlined in Table 915-1.

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, the 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 laboratory reports were received directly from Origins Laboratory on April 10 and April 22, 2025, and from Summit Scientific on March 31, 2025. Each report includes a watermark confirming the laboratory representative responsible for the reissuance, as well as the date and time of the reissuance. Additionally, a Digital ID/Verified Certification (lock) was applied to support the reissuance, ensuring the integrity and authenticity of the documents. 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 reports 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.

Quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the supplemental site investigation 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: Ethan Black

Title: Consultant

Submit Date: _____

Email: ethanb@fremontenv.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: 31728

COA Type

Description

COA Type	Description
0 COA	

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

404280764	LABORATORY ANALYTICAL REPORT
404280766	LABORATORY ANALYTICAL REPORT
404280767	LABORATORY ANALYTICAL REPORT
404280768	LABORATORY ANALYTICAL REPORT
404280770	LABORATORY ANALYTICAL REPORT
404280772	SITE INVESTIGATION REPORT
404280773	REMEDIAL ACTION PLAN
404280774	SITE INVESTIGATION REPORT

Total Attach: 8 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)