

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404337394

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: NOBLE ENERGY INC	Operator No: 100322	Phone Numbers
Address: 1099 18TH STREET SUITE 1500		Phone: (970) 786-0202
City: DENVER State: CO Zip: 80202		Mobile: ()
Contact Person: Kris Shepherd	Email: Kristofer.Shepherd@chevron.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25436 Initial Form 27 Document #: 403184619

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: WELL	Facility ID: _____	API #: 123-25729	County Name: WELD
Facility Name: PATRIOT B 16-20	Latitude: 40.399252	Longitude: -104.559793	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 16	Twp: 5N	Range: 64W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 483970	API #: _____	County Name: WELD
Facility Name: Patriot B16-20	Latitude: 40.396640	Longitude: -104.555606	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 16	Twp: 5N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Range 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

Irrigation Ditches 0.01mi N, 0.24mi W, 0.03mi E, 0.15/0.16mi SE
No other potential receptors are located within ¼ mile of the Site.
Above distances are approximations.

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	See tables and figures	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.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the PATRIOT B16-20 wellhead cut and cap and flowline removal. Approximately 2452' of flowline was removed. The wellhead was cut and capped per ECMC rules. Additionally, 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.

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 along the flowline 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. 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, and EC, SAR, pH, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods. A grab confirmation soil sample will be collected at the wellhead excavation in base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. The ECMC will be updated with the results of the wellhead decommissioning activities on a supplemental F27.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Groundwater was not encountered during the site investigation.

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 wellhead and flowline areas occurred during abandonment activities. Field personnel field screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. The applicable ECMC Closure Checklists were utilized and filled out during the abandonment process.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 4
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 400

NA / ND

Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 1.19
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

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?

Five background soil samples were collected from an area not impacted by oil and gas development and at similar depths (3') and lithologies as confirmation soil samples collected at the location and analyzed for Table 915-1 metals and SSR constituents. Background soil sample analytical results were reported with elevated levels of arsenic, barium, cadmium, lead, selenium, and pH.

Background Soil Sample Analysis (mg/kg)

Arsenic Max*1.25 = 5.25
Barium Max*1.25 = 196
Cadmium Max*1.25 = 0.67
Lead Max*1.25 = 24
Selenium 5 Ft: Max*1.25 = 0.501
pH Max = 8.66

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 Chevrons Data Integrity review for projects associated with former Business Partners, the wellhead (WH-FS-01 @6') point of compliance sample will be recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1.

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 was removed from the release area at the Patriot B 16-20 flowline location by excavation. The impacted soil was 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.

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.

Excavation of impacted soil was undertaken to remove impacts observed three feet below ground surface along the Patriot B 16-20 flowline. Confirmation soil samples were collected and analyzed for ECMC Table 915-1 organic and Soil Suitability for Reclamation constituents (TPH, BTEX, 1,2,4 Trimethylbenzene, 1,3,5 Trimethylbenzene, Naphthalene, Polycyclic Aromatic Hydrocarbons [PAHs], pH, SAR, EC, and Boron) and ECMC Table 915-1 metals. Excavation activities are detailed in the attached.

The Operator will apply of the RSSLs as closure criteria based on a greater than 30 feet separation between the excavation's maximum depth of two feet bgs and a depth to water of 43 feet bgs demonstrating the improbability for communication between groundwater and historical hydrocarbon impacts at the Patriot location as approved on Doc. # 403726186. The Operator will address residual elevated metals concentrations at the former separator location and pH at the flowline FL08 bellhole location with a additional background sampling. The Operator has consolidated reporting from REM 25418 to REM 25436 as approved on Doc. # 403726186.

On 3/12/25 flowline sampling activities were completed along the PATRIOT B 16-20 (Patriot) flowline. During the completion of the activities, AVO evidence of impacted material(s) was not observed. Final laboratory analytical results received on 4/28/25, at 9:14 AM indicated that soil samples, FL02 3 Ft and FL05 3 Ft, collected along the flowline path, exceeded ECMC Table 915 Protection of Groundwater Soil Screening Levels for (PGSSLs) for naphthalene (FL05 - 0.0129 mg/kg) and benzo (a) anthracene (FL02 - 0.134 mg/kg and FL05 - 0.0234 mg/kg). Since application of RSSLs as closure criteria was approved prior to the 3/12/2025 sampling event as release was not reported.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	Yes _____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) _____ 10
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
_____ Natural Attenuation	No _____ Excavate and onsite remediation
_____ Other _____	_____ Land Treatment
	_____ Bioremediation (or enhanced bioremediation)
	_____ Chemical oxidation
	_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)

No _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

No _____ Natural Attenuation

No _____ 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.

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 Form 27 FL Resampling and Proposed Wellhead Resampling

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 (policies 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:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 10

E&P waste (solid) description hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill, Keenesburg, CO

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.

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. 10/31/2027

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. 08/17/2022

Actual Spill or Release date, or date of discovery. 02/28/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/10/2023

Proposed site investigation commencement. 10/15/2022

Proposed completion of site investigation. 02/10/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/20/2023

Proposed date of completion of Remediation. 03/26/2025

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 27 is being submitted to provide a remediation progress update for the Patriot B 16-20 (Rem # 25436) flowline and wellhead location, address COAs provided 4/9/2024 on F27 document # 403726186 and 10/27/26 on F27 document # 404226042, and move this REM back into compliance with its approved quarterly reporting schedule.

In an effort to consolidate reporting of remedial activities related to Spill 483969 conducted at the Patriot B65N64W Tank Battery SEP E SURF./FL09 separator flowline riser release location the Operator has been submitting remediation progress updates to the associated Patriot B 16-20 flowline remediation number 24536. To abide by the ECMC's COA provided 4/9/2024 on F27 document # 403726186 the Operator will continue reporting related to Spill 483970 under Remediation 25436 and continue all remediation reporting related to the Patriot B65N64W Tank Battery (Rem # 25418) to Rem. # 25418. The Operator removed all Site Information referencing the Patriot B65N64W Tank Battery (Rem # 25418) on the Patriot B 16-20, Rem. # 25436 Site Information section.

The Operator removed background samples collected adjacent to the SEP E SURF./FL09 separator/flowline riser excavation for native soil comparison since they appear influenced by oil and gas activity and may not be valid for the purposes of establishing background. However, background collected near excavation at the FL08 flowline release location (Spill 483970) are still being used for native soil characterization and background comparison. To clarify the Operator's statement on document # 403726335 regarding addressing arsenic, barium and selenium at the former separator location: the Operator will collect background samples from areas not impacted by oil and gas development at similar depths and lithologies as confirmation samples collected at the location. If metals concentrations observed in the Patriot B65N64W Tank Battery (Rem # 25418) cannot be attributed to native soil conditions via background soil comparison a minimum additional samples will be collected to delineate the magnitude and extent of elevated metals. The Operator will evaluate remedial alternatives, such as excavation, to address in situ elevated metals not attributable to background concentrations and greater than the applicable Table 915-1 concentration standards.

To adhere to approved Initial Form 27 workplan for flowline assessment the Operator is submitting assessment of the flowline sampling completed on 3/11/2025.

As part of Chevrans Data Integrity review for projects associated with former Business Partners, the wellhead (WH-FS-01@6) point of compliance sample will be recollected in accordance with the approved Form 27 investigation plan and analyzed for full Table 915-1.

Pursuant to Rule 913.e, 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: 25436

<u>COA Type</u>	<u>Description</u>
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.

<u>Att Doc Num</u>	<u>Name</u>
404607979	LABORATORY ANALYTICAL REPORT
404608635	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

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

Total: 0 comment(s)