

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

CHRIS CANFIELD

## 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 COGCC 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

### OPERATOR INFORMATION

Name of Operator: NOBLE ENERGY INC		Operator No: 100322	<b>Phone Numbers</b>	
Address: 1001 NOBLE ENERGY WAY		Phone: (970) 3045329		
City: HOUSTON	State: TX	Zip: 77070		Mobile: ( )
Contact Person: Jacob Evans		Email: jacob.evans@nblenergy.com		

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 8440 Initial Form 27 Document #: 2148980

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input checked="" type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water        |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure                             | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                 | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project                                  |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste                      | <input type="checkbox"/> Rule 906.c.: Director request   |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other   |

#### SITE INFORMATION

N Multiple Facilities ( in accordance with Rule 909.c. )

Facility Type: LOCATION	Facility ID: 376820	API #:	County Name: ADAMS
Facility Name: FRI-61S67W 18CSE		Latitude: 39.960989	Longitude: -104.926653
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: CSE	Sec: 18	Twp: 1S	Range: 67W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use CROP LAND

Is domestic water well within 1/4 mile? Yes 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

SURFACE WATER 640' E, WATER WELL 836' N.

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

☒ E&P Waste

☐ Other E&P Waste

☐ Non-E&P Waste

☒ Produced Water

☐ Workover Fluids

☒ Oil

☐ Tank Bottoms

☒ Condensate

☐ Pigging Waste

☐ Drilling Fluids

☐ Rig Wash

☐ Drill Cuttings

☐ Spent Filters

☐ Pit Bottoms

☐ Other (as described by EPA)

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	~53,500 SQUARE FEET	Lab Analytical
Yes	SOILS	~367,500 CUBIC FEET	Lab Analytical

### INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

SEE FORM 19, COGCC DOCUMENT #2147193.

### 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 ):

Soil samples were collected as part of the site investigation and analyzed for TPH-GRO, TPH-DRO, Naphthalene, and BTEX.

#### Proposed Groundwater Sampling

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

Groundwater samples were collected as part of the site investigation and analyzed for BTEX. Groundwater monitoring will be scheduled on a quarterly basis. Point of compliance has been achieved at the location.

#### 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 ):

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 33

Number of soil samples exceeding 910-1 6

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

Approximate areal extent (square feet) 52000

### NA / ND

-- Highest concentration of TPH (mg/kg) 1859

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 53

### Groundwater

Number of groundwater samples collected 42

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 29'

Number of groundwater monitoring wells installed 42

Number of groundwater samples exceeding 910-1 24

-- Highest concentration of Benzene (µg/l) 15000

-- Highest concentration of Toluene (µg/l) 33000

-- Highest concentration of Ethylbenzene (µg/l) 1200

-- Highest concentration of Xylene (µg/l) 18000

NA Highest concentration of Methane (mg/l)

### Surface Water

0 Number of surface water samples collected

0 Number of surface water samples exceeding 910-1

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?

POINT OF COMPLIANCE SAMPLES COLLECTED ARE IN COMPLIANCE WITH COGCC REGULATIONS. POINT OF COMPLIANCE HAS BEEN ACHIEVED ON THE UPGRADIENT, DOWN GRADIENT, AND CROSS GRADIENT AREAS OF THE SITE. ADDITIONAL GROUNDWATER SAMPLING WILL BE CONDUCTED ON A QUARTERLY BASIS.

# 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.

IMPACTED SOILS WERE REMOVED DURING SITE DECOMMISSIONING ACTIVITIES IN 2005, AS DESCRIBED IN COGCC DOCUMENT #1139858. INTERIM REMEDIAL ACTIONS CURRENTLY UNDERWAY CONSIST OF LNAPL RECOVERY USING AUTOMATED AND MANUAL RECOVERY TECHNIQUES. AUTOMATED LNAPL RECOVERY PUMPS ARE CURRENTLY INSTALLED IN FOUR SITE MONITORING WELLS (PR01, PR02, SB05, AND SB30). ADDITIONAL RECOVERY WELLS WILL BE INSTALLED TO OPTIMIZE LNAPL RECOVERY AT THE SITE. FOLLOWING THE CONCLUSION OF SOURCE REMOVAL ACTIVITIES, DISSOLVED IMPACTS WILL BE ADDRESSED

## 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.

LNAPL recovery wells PR01-PR26 were installed and are currently operational. Soil vapor extraction will be utilized during LNAPL recovery. Dissolved BTEX will be addressed subsequent to LNAPL removal.

## Soil Remediation Summary

☒ In Situ

No Bioremediation ( or enhanced bioremediation ) \_\_\_\_\_

No Chemical oxidation \_\_\_\_\_

Yes Air sparge / Soil vapor extraction \_\_\_\_\_

Yes Natural Attenuation \_\_\_\_\_

No Other \_\_\_\_\_

☐ Ex Situ

Excavate and offsite disposal \_\_\_\_\_

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

Excavate and onsite remediation \_\_\_\_\_

No Land Treatment \_\_\_\_\_

No Bioremediation (or enhanced bioremediation) \_\_\_\_\_

No Chemical oxidation \_\_\_\_\_

No Other \_\_\_\_\_

## Groundwater Remediation Summary

No Bioremediation ( or enhanced bioremediation ) \_\_\_\_\_

No Chemical oxidation \_\_\_\_\_

Yes Air sparge / Soil vapor extraction \_\_\_\_\_

Yes Natural Attenuation \_\_\_\_\_

Yes Other LNAPL Recovery wells \_\_\_\_\_

## 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.

SOURCE AREA AND POINT OF COMPLIANCE (POC) WELLS WERE INSTALLED AT THE SITE TO ASSESS THE EXTENT OF GROUNDWATER IMPACTS. THESE WELLS WILL BE MONITORED QUARTERLY UNTIL ACCEPTABLE CLOSURE LEVELS HAVE BEEN ACHIEVED. MONITORING WELLS SB03 THROUGH SB15, SB16R, SB17, SB19 THROUGH SB21, SB22R, SB23, SB25R, SB27R, SB28R, SB30, 2B31, SB32, AND SB36 THROUGH SB39, THESE INCLUDE CURRENT POINT OF COMPLIANCE MONITORING WELLS AND SOURCE MONITORING WELLS. GROUNDWATER WILL BE ANALYZED USING ANALYTICAL METHOD USEPA METHOD 8260B.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**Report Type:** ☒ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☐ Other \_\_\_\_\_

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes \_\_\_\_\_

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 \_\_\_\_\_ 0

E&P waste (solid) description \_\_\_\_\_

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 184

E&P waste (liquid) description Impacted groundwater above  
COGCC Table 910-1 standards \_\_\_\_\_

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: NGL \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No \_\_\_\_\_

Do all soils meet Table 910-1 standards? No \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? No \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? No \_\_\_\_\_

Is additional groundwater monitoring to be conducted? Yes \_\_\_\_\_

## 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.

FINAL RECLAMATION ACTIVITIES WILL BE DEVELOPED IN CONJUNCTION WITH THE PROPERTY OWNER BASED ON USE OR ANTICIPATED USE AT THE TIME OF FINAL RECLAMATION. IN ADDITION, SUBSEQUENT TO RECEIPT OF A NO FURTHER ACTION (NFA) DESIGNATION, THE MONITORING WELLS AND REMEDIATION WELLS WILL BE PROPERLY PLUGGED AND ABANDONED PER COLORADO DIVISION OF WATER RESOURCES STANDARDS.

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 approve the seed mix? \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, if known. 11/04/2013

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). \_\_\_\_\_

Date of commencement of Site Investigation. 11/04/2013

Date of completion of Site Investigation. 04/21/2014

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 11/12/2013

Date of completion of Remediation. \_\_\_\_\_

### SITE RECLAMATION DATES

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

### OPERATOR COMMENT

Fri 2-18

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

Signed: Jacob Evans

Title: Environmental Coordinator

Submit Date: 07/12/2018

Email: jacob.evans@nblenergy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: CHRIS CANFIELD

Date: 08/02/2018

Remediation Project Number: 8440

### COA Type

### Description

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## Attachment Check 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

401701486	FORM 27-SUPPLEMENTAL-SUBMITTED
401701506	REMEDATION PROGRESS REPORT

Total Attach: 2 Files

## General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)