

# State of Colorado Oil and Gas Conservation Commission

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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 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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

### OPERATOR INFORMATION

Name of Operator: NOBLE ENERGY INC	Operator No: 100322	<b>Phone Numbers</b> Phone: (715) 562-0251 Mobile: ( )
Address: 2001 16TH STREET SUITE 900		
City: DENVER	State: CO Zip: 80202	
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9150 Initial Form 27 Document #: 2143666

#### 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: SPILL OR RELEASE	Facility ID: 441780	API #:	County Name: WELD
Facility Name: SPILL/RELEASE POINT	Latitude: 40.304656	Longitude: -104.654142	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENW	Sec: 22	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SC  
 Most Sensitive Adjacent Land Use Agricultural Land  
 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? Yes

**Other Potential Receptors within 1/4 mile**

Surface water 1069'W

**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	180 X 120	Lab Analytical
Yes	SOILS	45' X 54' X 7' bgs	Lab Analytical

**INITIAL ACTION SUMMARY**

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

The facility was shut in and a site assessment was scheduled. Refer to Spill/Release Report

Document #400840208. Chesnut G22-3,4 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 ):

Twenty seven (27) soil samples were collected and analyzed for TPH-DRO, TPH-GRO, BTEX, and Naphthalene to confirm source impacts were remediated.

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

Nineteen (19) groundwater samples were collected during site investigation activities to determine the extent of dissolved phase BTEX.

**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 27  
Number of soil samples exceeding 915-1 1  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 2430

### **NA / ND**

-- Highest concentration of TPH (mg/kg) 240  
-- Highest concentration of SAR 0.771  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 7

### **Groundwater**

Number of groundwater samples collected 19  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 7  
Number of groundwater monitoring wells installed 19  
Number of groundwater samples exceeding 915-1 15

-- Highest concentration of Benzene (µg/l) 31000  
-- Highest concentration of Toluene (µg/l) 18000  
-- Highest concentration of Ethylbenzene (µg/l) 3800  
-- Highest concentration of Xylene (µg/l) 54000  
NA Highest concentration of Methane (mg/l)

### **Surface Water**

0 Number of surface water samples collected  
0 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?

## **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 soil will be excavated and treated onsite by chemical oxidation using hydrogen peroxide. The stockpiled soil will be processed through a soil shredder, and sprayed with hydrogen peroxide as it passes through the shredder. After confirmation analytical testing is complete, treated soil will be used as backfill material. Additional source material will be excavated during plugging and abandonment procedures.

## **REMEDATION 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.

An air sparge and soil vapor extraction remediation system was installed to treat residual soil and dissolved phase groundwater. Twenty-two (22) monitoring wells were installed and on a quarterly basis to monitor the dissolved plume and ensure it is stable and decreasing. During the past four (4) quarterly monitoring events, BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene have either been non-detect, or not detected above COGCC Table 915-1 Groundwater Standards in thirteen of the twenty-two monitoring wells. As such, Noble requests that BH03R, BH08R, BH12R, BH23-BH31, and BH34 be removed from the sampling plan.

## **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**

No Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_  
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
Yes Excavate and onsite remediation  
No Land Treatment  
No Bioremediation (or enhanced bioremediation)  
Yes Chemical oxidation  
No Other \_\_\_\_\_

**Groundwater Remediation Summary**

No Bioremediation ( or enhanced bioremediation )  
No Chemical oxidation  
Yes Air sparge / Soil vapor extraction  
Yes 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.

Nine (9) monitoring wells (BH01R, BH02, BH04R, BH17, BH20, BH21, BH22, BH33R3, and BH35) will be sampled and analyzed for BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene on a quarterly basis. Inorganic parameters in groundwater will be sampled in monitoring wells BH01R, BH21, BH22, BH33R3, and BH35. Monitoring well BH33R3 was destroyed during the third quarter of 2022, and will be reinstalled in the winter of 2022-2023.

## 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

### 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 COGCC rules. Records are available on the COGCC'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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

During source remediation soil shredding with hydrogen peroxide was utilized to remediate hydrocarbon impacted soil above COGCC Table 910-1 standards.

Volume of E&P Waste (solid) in cubic yards 772

E&P waste (solid) description Impacted soil above COGCC Table 910-1 standards

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Beneficial reuse

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC 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? No

Is additional groundwater monitoring to be conducted? Yes

Operator shall comply with the COGCC 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 compliance with the COGCC 1000 series rule. In addition, subsequent to receipt of a No Further Action (NFA) designation, monitoring wells and remediation wells will be properly plugged and abandoned per Colorado Division of Water Resources standards.

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? \_\_\_\_\_

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. \_\_\_\_\_

Proposed date of completion of Reclamation. \_\_\_\_\_

## 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. 06/01/2020

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 06/05/2015

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/19/2015

Proposed date of completion of Remediation. 12/31/2026

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**

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: 10/27/2022

Email: chevroneform@tasman-geo.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: Alexander Ahmadian

Date: 12/28/2022

Remediation Project Number: 9150

**COA Type****Description**

	COGCC agrees to the removal of BH26-BH31, and BH34 from the groundwater monitoring program; however, Operator shall continue to sample BH03R, BH08R, BH12R, and BH23-BH25 for use as a point of compliance. If future data indicate the need for additional site characterization or establishing point of compliance, COGCC may require additional monitoring wells be returned to the program.
1 COA	

**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**

403210826	FORM 27-SUPPLEMENTAL-SUBMITTED
403210893	MONITORING REPORT

Total Attach: 2 Files

**General Comments****User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)