

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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404036181

Receive Date:

12/22/2024

Report taken by:

Nick Cholas

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: (330) 597-6847
City: DENVER	State: CO	Zip: 80202
Contact Person: Phillip Porter	Email: RBUEUF27@chevron.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21615 Initial Form 27 Document #: 402926828

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: 306446	API #: _____	County Name: WELD
Facility Name: WALKER-64N65W 4SENW	Latitude: 40.345010	Longitude: -104.672500	
** correct Lat/Long if needed: Latitude: 40.343584		Longitude: -104.672859	
QtrQtr: SENW	Sec: 4	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 482209	API #: _____	County Name: WELD
Facility Name: WALKER-64N65W 4SENW	Latitude: 40.343831	Longitude: -104.672831	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 4	Twp: 4N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW _____

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? Yes _____

Other Potential Receptors within 1/4 mile

Freshwater Pond 0.25mi E
Farm Structures 0.2mi N
Riverine 0.14/0.16mi S
Tank Battery 0.21mi SW

DENIED

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	TBD	Lab analysis
Yes	SOILS	~12'x~12'x~7'	Lab analysis

INITIAL ACTION SUMMARY

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

A site investigation was conducted pursuant to ECMC Rule 911 at the WALKER T4N-R65W-S4 L01 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):

Seven (7) grab confirmation soil samples will be collected from the produced water vessel excavation (5), beneath the above-ground oil tank (1), and at the separator (1). 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, EC, SAR, pH, and boron. Five (5) samples were submitted for waste characterization of ECMC Table 915-1 metals. 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 will be collected and analyzed for all organic 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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 16

Number of soil samples exceeding 915-1 7

NA / ND

-- Highest concentration of TPH (mg/kg) 713

-- Highest concentration of SAR 1.16

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

BTEX > 915-1 Yes

Approximate areal extent (square feet) 145

Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 36

-- Highest concentration of Benzene (µg/l) 61.4

Was extent of groundwater contaminated delineated? No

-- Highest concentration of Toluene (µg/l) 10.3

Depth to groundwater (below ground surface, in feet) 8

-- Highest concentration of Ethylbenzene (µg/l) 43.7

Number of groundwater monitoring wells installed 8

-- Highest concentration of Xylene (µg/l) 389

Number of groundwater samples exceeding 915-1 5

NA 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 background sample for pH, and ECMC Table 915-1 metals analysis was collected. Residual metals do not exceed applicable regulatory limits and/or background comparison/local "clean-up level" (see arsenic). Inorganic parameters in groundwater observed in up-gradient, unimpacted monitoring well MW-06 were used in the determination of "local background levels" at the site. Concentrations of chloride and sulfate anions and total dissolved solids (TDS) are less than/consistent with local background levels.

☐ 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?

A site assessment will be scheduled to delineate impacted media observed at the site. Noble proposes soil samples will be collected for analysis of the Table 915-1 TPH (C6-C36) and organics in soil. Residual metals and pH at the site do not appear attributable to the release. If groundwater is encountered each soil boring will be completed as a monitoring well and the groundwater will be sampled for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 1-methylnaphthalene, 2-methylnaphthalene, and inorganic parameters.

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.

A subsurface assessment was conducted to delineate residual impacts at the site. Upon encountering groundwater, eight (8) soil borings were completed as monitoring wells. Soil samples were collected for analysis of ECMC Table 915-1 TPH (C6-C36) and organics in soil in accordance with approved Form 27 Doc. # 403259972. Residual metals and pH at the site do not appear attributable to the release.

REMEDIAL 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.

A subsurface assessment was conducted to delineate residual impacts at the site. Eight (8) soil borings were completed as monitoring wells. Analytical results identified residual petroleum hydrocarbon impacts in soil collected from MW-01. Monitoring wells will continue to be sampled on a quarterly basis to monitor natural attenuation of dissolved impacts. Additional remediation strategies may be proposed in a supplemental Form 27 as applicable.

NFA status will be considered when soil is in compliance with ECMC Table 915-1 regulatory limits and a minimum of four (4) quarters of groundwater analytical results are in compliance with ECMC Table 915-1 regulatory limits.

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

_____ Natural Attenuation

_____ Other _____

_____ 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

Yes _____ 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.

Monitoring wells MW-01 through MW-08 will be sampled on a quarterly basis for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 1-methylnaphthalene, 2-methylnaphthalene, and inorganic parameters per ECMC 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 Monitoring Well Installation Report

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.

Operator anticipates the remaining cost for this project to be: \$ 60000

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? No

Is additional groundwater monitoring to be conducted? Yes

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 ECMC1000 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? _____

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. 05/10/2022

Proposed date of completion of Reclamation. 10/31/2030

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. 11/03/2021

Actual Spill or Release date, or date of discovery. 05/18/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/10/2022

Proposed site investigation commencement. 02/01/2022

Proposed completion of site investigation. 02/28/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/10/2022

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

Previous Form 27 Doc #403923322 was denied for data integrity review.

Chevron is performing a robust project review and will address the following COA's on the next supplemental form 27:

"ECMC has denied this Form 27 due to discrepancies in analytical data associated with the Remediation project. Operator will submit a replacement Form 27 for this project that includes the following components:

A statement from the Operator indicating that this project is included in the data integrity review;

A site-specific description describing any data anomalies in the project record;

The original, correct laboratory analytical report as a stand-alone attachment; and

A Form 19 Document ID as a Related Document, if necessary to report a Spill or Release."

Eight (8) soil borings were completed as monitoring wells. Monitoring wells MW-01 through MW-08 will be sampled on a quarterly basis. Noble seeks the ECMC's approval of this form as they are aware of the gap in reporting from the the December 2021 groundwater sampling event until now. Groundwater monitoring reports for 2022 are attached to current submittal. Following the review by the ECMC, Noble will complete 90-day reporting to comply with current ECMC regulations.

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

Signed: Abigail Sheehan

Title: Environmental Consultant

Submit Date: 12/22/2024

Email: cvxform27@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: 21615

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

404036181	FORM 27 DENIED
404036258	MONITORING REPORT
404036260	SITE INVESTIGATION REPORT
404036261	MONITORING REPORT
404067432	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

General Comments

User Group

Comment

Comment Date

Environmental	ECMC has denied this form as the Operator has provided no substantial and verifiable information as to how the documentation was verified. ECMC will not approve any future forms until all of this information has been provided and verified.	01/23/2025
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Total: 1 comment(s)