

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

404101768

Receive Date:

02/24/2025

Report taken by:

Kyle Waggoner

## 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
Contact Person: Dan Peterson	Email: danpeterson@chevron.com	Mobile: ( )

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 21830 Initial Form 27 Document #: 402944066

## 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: 323068	API #: _____	County Name: WELD
Facility Name: BRANCH-64N64W 3NENE	Latitude: 40.346798	Longitude: -104.529377	
** correct Lat/Long if needed: Latitude: 40.348379		Longitude: -104.530032	
QtrQtr: NENE	Sec: 3	Twp: 4N	Range: 64W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 482385	API #: _____	County Name: WELD
Facility Name: Branch 1-3	Latitude: 40.348412	Longitude: -104.529767	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 3	Twp: 4N	Range: 64W 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? No

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

HWY 0.01mi N

Residential 0.09/0.1/0.19mi E, 0.2/0.22mi S, 0.15mi SW, 0.25mi NE, 0.2mi W, 0.25mi N

Farm Structures 0.09/0.17/0.22mi E, 0.2mi SE, 0.14/0.17mi S, 0.23mi W

Freshwater Emergent Wetlands 0.23mi SW

No other potential receptors are located within ¼ mile of the site.

Above distances are approximations.

## 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
No	GROUNDWATER	See attached figure	Laboratory analysis
Yes	SOILS	See attached figure	Laboratory 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 COGCC Rule 911 at the BRANCH T4N-R64W-S3 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 ):

Ten soil borings were advanced to determine extent of soil impacts due to an historical release from the facility's produced water vault. Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) and organic compounds in soil per COGCC Table 915-1. All samples collected were analyzed by a certified laboratory using approved COGCC laboratory analysis methods.

#### Proposed Groundwater Sampling

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

Not encountered

#### 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 41

Number of soil samples exceeding 915-1 56

Was the areal and vertical extent of soil contamination delineated? No

#### NA / ND

-- Highest concentration of TPH (mg/kg) 9980

-- Highest concentration of SAR 11.4

BTEX > 915-1 Yes

Approximate areal extent (square feet) 8000

Vertical Extent &gt; 915-1 (in feet) 13

**Groundwater**

Number of groundwater samples collected 5

Was extent of groundwater contaminated delineated? Yes

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

Number of groundwater monitoring wells installed 5

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

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?

One background soil sample (BKG01 @6") was collected from an area not impacted by oil and gas development and analyzed for Table 915 Soil Suitability constituents (pH, EC, SAR, and Boron) and Table 915 metals. The background soil sample was reported with elevated concentrations/values of SAR, Arsenic, and Selenium.

☐ 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?

Additional investigation needs to be completed to delineate the extent of the reported groundwater impacts.

**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.

As much of the source was removed as practicable by the conventional excavation of soil that exceeded Table 915-1 limits for organic compounds in soil.

**REMEDIAL ACTION 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.

Approximately 3,850 cubic yards of impacted soil was excavated and disposed of at Buffalo Ridge Landfill. Impacted, unsaturated soil identified on the North wall of the excavation along County Road 5 could not be removed due to overhead electric lines and telecom utilities. As described in the Groundwater Monitoring section, soil borings/monitoring wells were installed to delineate the lateral extent of the reported groundwater impacts.

Three borings were advanced in the former excavation's North wall to determine if residual soil impacts present at 10 feet bgs. had naturally attenuated. Natural attenuation has successfully remediated soil impacts initially observed in N01 10', N02 10', and N03 10' excavation confirmation sample locations based on the lab results for samples collected on 8/16/2024.

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 ECOM in a supplemental Form 27.

**Soil Remediation Summary**☒ In Situ☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 3850

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

Yes \_\_\_\_\_ 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.

Groundwater will be sampled on a quarterly basis until analytical results are reported with concentrations of Table 915-1 analytes below regulatory limits for four consecutive quarters. Five monitoring wells (MW-1 through MW-5) are sampled on a quarterly basis to monitor (natural) attenuation. Groundwater monitoring wells were sampled and submitted to a laboratory for analysis of Table 915-1 groundwater constituents: Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Chloride ion, Sulfate ion and Total Dissolved Solids (TDS).

## 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 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: \$ 20000

### 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 3850

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: WM Buffalo Ridge Landfill

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?

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 COGCC 1000 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. 06/29/2022

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

## 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. 07/29/2021

Actual Spill or Release date, or date of discovery. 06/20/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/29/2022

Proposed site investigation commencement. 02/14/2022

Proposed completion of site investigation. 06/29/2022

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/26/2022

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:

**OPERATOR COMMENT**

This form updates with ECMC with data collected during the Q4 2024 groundwater sampling at the location.

This form serves to comply with the Rule 913.e. reporting schedule. The review status of the previously proposed workplans (Doc. # 404005821 and 403906261) are "In Process" on Web Forms. Pending ECMC EPS form review/approval, the Operator will complete the additional site investigation and remediation as outlined on Doc. # 404005821, 403906261, and this F27. Supplemental Form 27s will be prepared and submitted on a quarterly schedule to provide updates and progress of the remediation until closure criteria have been achieved.

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

Signed: Chris Lattes

Title: Consultant

Submit Date: 02/24/2025

Email: chrisl@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: Kyle Waggoner

Date: 03/17/2025

Remediation Project Number: 21830

**COA Type****Description**

	The work plan presented on document numbers: 403906261 and 404005821 are not substantively different than the work plan approved on document number: 403278103. Therefore waiting on review of documents 403906261 and 404005821 is not an adequate reasoning for delaying execution of the work plan. On next form submittal Operator shall provide an adequate reasoning for the delay and a schedule to execute the additional work as soon as practicable.
1 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**

404101768	FORM 27-SUPPLEMENTAL-SUBMITTED
404101834	MONITORING REPORT
404101837	ANALYTICAL RESULTS

Total Attach: 3 Files

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

Environmental	Based on data presented by Operator the existing monitoring well network appears to be centered south of the previously observed groundwater exceedance with groundwater flow in a NNE direction.	03/13/2025
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Total: 1 comment(s)