

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203

Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

404167131

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) 313-5582
City: DENVER	State: CO	Zip: 80202
Contact Person: Jason Davidson	Email: jason.davidson@chevron.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34724 Initial Form 27 Document #: 403690278

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 #: 123-26113	County Name: WELD
Facility Name: JOHNSON C 29-28	Latitude: 40.291080	Longitude: -104.575370	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESW	Sec: 20	Twp: 4N	Range: 64W
Meridian: 6	Sensitive Area? Yes		

Facility Type: SPILL OR RELEASE	Facility ID: 487473	API #: _____	County Name: WELD
Facility Name: Johnson C29-28	Latitude: 40.290872	Longitude: -104.575760	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESW	Sec: 20	Twp: 4N	Range: 64W
Meridian: 6	Sensitive Area? Yes		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>487479</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>Johnson C29-28</u>				Latitude: <u>40.291064</u>		Longitude: <u>-104.575378</u>	
** correct Lat/Long if needed: Latitude: _____ Longitude: _____							
QtrQtr: <u>SESW</u>	Sec: <u>20</u>	Twp: <u>4N</u>	Range: <u>64W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>SPILL OR RELEASE</u>		Facility ID: <u>487480</u>		API #: _____		County Name: <u>WELD</u>	
Facility Name: <u>Johnson C29-28</u>				Latitude: <u>40.290822</u>		Longitude: <u>-104.575921</u>	
** correct Lat/Long if needed: Latitude: _____ Longitude: _____							
QtrQtr: <u>SESW</u>	Sec: <u>20</u>	Twp: <u>4N</u>	Range: <u>64W</u>	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Grassland

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

Residential 0.04mi E
Farm Structure 0.06/0.08mi NE

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
UNDETERMINED	GROUNDWATER	NA	Lab analysis or field screening, if encountered.
Yes	SOILS	Refer to Tables and Figures	Lab analysis or field screening

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 JOHNSON C29-28 wellhead cut and cap and flowline removal. Approximately 1076' of flowline was removed. The wellhead was cut and capped per ECMC rules. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken 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. The Flowline Pre-Abandonment Notice Document number is 403861725.

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):

A grab soil sample was collected at the base of the excavation or the area showing the highest degree of impact during field screening activities at the wellhead excavation. Additionally, soil samples were field screened at the N-E-S-W sides of the wellhead. Soil samples were taken 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. Soil samples were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. 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 and inorganic compounds per ECMC Table 915-1; this sample analysis includes, but is not limited to BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260, chloride and sulfate anions by EPA Method 300.0, and total dissolved solids (TDS) by Method SM 2540C.

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 ECMC Wellhead Closure Checklist was filled out during the abandonment process. A detailed summary of flowline decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, was attached to Form 27 Document #403853118.

A detailed summary of wellhead decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to this Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 20

Number of soil samples exceeding 915-1 6

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

Approximate areal extent (square feet) 600

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 5.81

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 3

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

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?

Eleven background soil samples were collected near the flowline and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging between 3 to 4 feet below ground surface (ft. bgs). The maximum background concentrations for pH was observed to be 8.52. The maximum background concentrations with a 1.25x multiplier applied for arsenic and barium were calculated to be 4.66 mg/kg and 109 mg/kg respectively. All arsenic, and barium concentrations observed during decommissioning and supplemental site investigation (SSI) activities were below 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 supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the pH observed during the remedial excavation. A proposed SSI map is attached to this Form 27. During the SSI, soil samples will be collected and analyzed for full ECMC Table 915-1 constituents. Concurrently with the SSI, additional background samples will be collected to determine if pH is attributed to native soil conditions at the site. The SSI will be completed in accordance with the proposed implementation schedule, and the results of the SSI will be submitted on a subsequent Form 27.

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.

The source was removed through three separate remedial excavations on 08/01/2024 and 08/02/2024. The results of the remedial excavations are attached to this Form 27. Based on the results of the confirmatory soil samples, pH remains in-place above ECMC Table 915-1 standards. As such, additional delineation and background sampling will be conducted to determine if pH is attributed to native soil conditions at the site. The results of the supplemental site investigation will be submitted on a subsequent Form 27.

REMEDICATION 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.

Pursuant to the FL01R-W@3' release area, a total of approximately 20 cubic yards of impacted material were removed for off-Site disposal at the Buffalo Ridge Waste Management Landfill in Keenesburg, Colorado under signed Noble waste manifests. A total of approximately 20 cubic yards of imported clean fill was used to backfill the excavation. The final remedial excavation extent measured approximately 15 ft. by 15 ft. by 4 feet below ground surface (ft bgs).

Pursuant to the FL01-02@3' release area, a total of approximately 20 cubic yards of impacted material were removed for off-Site disposal at the Buffalo Ridge Waste Management Landfill in Keenesburg, Colorado under signed Noble waste manifests. A total of approximately 20 cubic yards of imported clean fill was used to backfill the excavation. The final remedial excavation extent measured approximately 15 ft. by 15 ft. by 4 feet below ground surface (ft bgs).

Pursuant to the FL01-03 release area, a total of approximately 20 cubic yards of impacted material were removed for off-Site disposal at the Buffalo Ridge Waste Management Landfill in Keenesburg, Colorado under signed Noble waste manifests. A total of approximately 20 cubic yards of imported clean fill was used to backfill the excavation. The final remedial excavation extent measured approximately 15 ft. by 15 ft. by 4 feet below ground surface (ft bgs).

A supplemental site investigation (SSI) will be completed to vertically and horizontally delineate the pH exceedances observed at sample locations SS01-FL01-02@3', SS02-FL01-02@3', SS03-FL01-02@3', SS04-FL01-02@3', SS01-FL01R-W@3', and SS02-FL01R-W@3', during remedial excavation, in accordance with the attached proposed site investigation map, and proposed sampling plan outlined in the Site Investigation Report section of this 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) _____ 60

_____ 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

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ 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 was not encountered during decommissioning or remedial excavation activities.

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 Source Mass Removal Report & Supplemental Site Investigation Proposal

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: \$ 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:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 60

E&P waste (solid) description Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management - Keenesburg

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? _____

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. 07/02/2024

Proposed date of completion of Reclamation. 10/17/2026

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. 02/15/2024

Actual Spill or Release date, or date of discovery. 07/12/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/02/2024

Proposed site investigation commencement. 04/17/2025

Proposed completion of site investigation. 10/17/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/17/2025

Proposed date of completion of Remediation. 04/17/2026

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:

The implementation schedule has been changed due to the decommissioning of the Johnson C29-28 Flowline and necessity for supplemental site investigation activities adjacent to the flowline. The proposed supplemental site investigation will be completed following the approval of this form.

OPERATOR COMMENT

In response to ECMC Form 27 Comment dated 12/5/2024 (Document Number 403959564), Operator is submitting a replacement Form 27. Based on currently available data, this project is not affected by data integrity irregularities and is not associated with Operator's data integrity review process and its Rule 525.e. Voluntary Disclosure. As part of its data integrity review process, Operator requested the lab protect the laboratory analytical report from subsequent unauthorized modification by anyone outside the lab, which resulted in the lab reissuing the original report with additional protections (Reissued Report).

The first Reissued Report was received directly from Enthalpy Laboratory on 2/13/2025 which includes a watermark confirming both the laboratory representative who reissued the report and the date and time of the reissuance.

The second and third Reissued Reports were received directly from Summit Laboratory on 4/1/2025 which included the application of a Digital ID/Verified Certification (lock) to support reissuance.

The metadata associated with the Reissued Reports also includes the lab representative's name, the date and time the laboratory reissued the report, and an explanation for the report reissuance. The Reissued Reports are attached to this submission.

A technical review of the laboratory analytical data associated with this Site was conducted. This review was conducted by our environmental consultant's internal Compliance Team, working independently of the Site Project Team. The review consisted of: verification of receipt of locked/encrypted laboratory report(s) from the contract analytical laboratory(ies); evaluation and verification that no laboratory data was altered; verification that reported laboratory results are consistent with the data presented throughout the eForm text, tables, and figures. This technical review did not identify any altered or inaccurate data.

In the event additional responsive information is received or discovered that would suggest this project should be incorporated into the ongoing data integrity review process associated with Operator's Rule 525.e. Voluntary Disclosure, Operator will update and/or amend the statements in this submission and provide any new or revised data or other information responsive to ECMC's general comments responding to Operator's Form 27 submission found in Document Number 403959564.

This Form 27 is being submitted to include wellhead decommissioning data and remedial excavation results for the former Johnson C29-28 Flowline location. A proposal to delineate the pH exceedances observed at sample locations SS01-FL01-02@3', SS02-FL01-02@3', SS03-FL01-02@3', SS04-FL01-02@3', SS01-FL01R-W@3', and SS02-FL01R-W@3', during remedial excavation, is presented in the Site Investigation Report section of this Form 27.

The former Johnson C29-28 Flowline was decommissioned on 7/2/2024, and results are include on Approved Form 27 Document # 403853118.

Eleven background soil samples were collected near the flowline and analyzed for metals in soil per ECMC Table 915-1, pH, SAR, EC, and boron. Background soil samples were collected from depths ranging between 3 to 4 feet below ground surface (ft. bgs). The maximum background concentrations for pH was observed to be 8.52. The maximum background concentrations with a 1.25x multiplier applied for arsenic and barium were calculated to be 4.66 mg/kg and 109 mg/kg respectively. All arsenic, and barium concentrations observed during decommissioning and supplemental site investigation (SSI) activities were below background levels.

Concurrently with the SSI, additional background samples will be collected to determine if pH is attributed to native soil conditions at the site.

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

Signed: Andy Sagen

Title: Environmental Consultant

Submit Date: _____

Email: tas-chevron-1@tasman-geo.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: 34724

COA Type

Description

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.

Att Doc Num

Name

404169051	SITE INVESTIGATION REPORT
404169052	SITE INVESTIGATION REPORT
404169080	LABORATORY ANALYTICAL REPORT
404169082	LABORATORY ANALYTICAL REPORT

404169085	LABORATORY ANALYTICAL REPORT
404169136	SITE INVESTIGATION PLAN
404169138	SITE INVESTIGATION PLAN

Total Attach: 7 Files

General Comments

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

Total: 0 comment(s)