

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
PETER GINTAUTAS

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: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Phil Hamlin</u>	Email: <u>Phil.Hamlin@Anadarko.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 9046 Initial Form 27 Document #: 2143108

PURPOSE INFORMATION

<input type="checkbox"/> 901.e. Sensitive Area Determination	<input 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 type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation	<input checked="" 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: <u>WELL</u>	Facility ID: _____	API #: <u>123-26181</u>	County Name: <u>WELD</u>
Facility Name: <u>STARCK 11-18</u>	Latitude: <u>40.311786</u>	Longitude: <u>-104.934642</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>18</u>	Twp: <u>4N</u>	Range: <u>67W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

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

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 and wetlands approximately 400 feet (ft) north, buildings approximately 850 ft northwest, and excavation groundwater approximately 12 ft below ground surface (bgs).

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	See Attached Data	Collected Groundwater Samples/Lab Analysis
Yes	SOILS	10ft N-S x 20ft E-W x 13ft bgs	Collected Soil Samples/Lab 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.

In March 2014, an operator discovered oil discharging from a hammer union on the wellhead. An estimated 0.25 barrel of oil was released. While excavating the hammer union oil release, soil with historical petroleum hydrocarbon impacts was encountered. The volume of the historical release is unknown. The petroleum hydrocarbon impacted soil was excavated. Groundwater was encountered in the excavation at approximately 12 ft bgs.

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):

On October 24 and 25, 2014, six soil samples were collected from the base and sidewalls of the excavation and submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX) and total petroleum hydrocarbon (TPH) analysis. The analytical results indicated that BTEX and TPH concentrations were compliant with Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the lateral extent of the excavation. The general site layout, excavation footprint, and soil sample locations are depicted on the Excavation Site Map provided as Figure 1. The soil sample analytical results are summarized in Table 1.

Proposed Groundwater Sampling

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

Groundwater was encountered in the excavation at approximately 12 ft bgs. On March 27, 2014, groundwater sample GW01 was collected from the excavation and submitted for BTEX analysis. Laboratory analytical results indicated that the groundwater sample exceeded the COGCC Table 910-1 allowable level for benzene. Following the removal of approximately 120 barrels of impacted groundwater, an additional groundwater sample (GW02) was collected from the excavation for BTEX analysis. Laboratory results for groundwater sample GW02 indicated the benzene concentration exceeded the COGCC allowable level. The excavation groundwater sample locations are depicted on the Excavation Site Map provided as Figure 1. The groundwater sample analytical results are summarized in Table 2.

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 6
Number of soil samples exceeding 910-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 200

NA / ND

-- Highest concentration of TPH (mg/kg) 1307
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 4

Groundwater

Number of groundwater samples collected 18
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 10'
Number of groundwater monitoring wells installed 4
Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 79.7
-- Highest concentration of Toluene (µg/l) 112
-- Highest concentration of Ethylbenzene (µg/l) 5.3
-- Highest concentration of Xylene (µg/l) 44.5
NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected
 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?

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.

Based on excavation groundwater samples exceeding COGCC Table 910-1 allowable levels, approximately 120 barrels of impacted groundwater were removed from the excavation and transported to a licensed injection facility for disposal using a vacuum truck. The excavation was completed into the phreatic zone to address potential hydrocarbon impacts that may have been present below the water table due to seasonal fluctuations. Approximately 95 cubic yards of impacted soil were excavated and transported to the Front Range Regional Landfill in Erie, Colorado, for disposal. The general site layout and excavation footprint are depicted on the Excavation Site Map attached as Figure 1.

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.

While backfilling the excavation, 50 pounds of BOS 200®, a carbon-based remediation product, was applied to the excavation groundwater immediately prior to backfilling. The excavation area was restored to its pre-release grade, and the Kerr-McGee well remains at the site.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 95

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

No Excavate and onsite remediation

_____ Other _____

_____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)

No _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____ Groundwater Removal

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.

In March 2016, four soil borings were advanced at the site and completed as monitoring wells MW01 through MW04. Monitoring wells MW01 through MW04 were destroyed as of the June 2016 monitoring event and were subsequently replaced in October 2016 with temporary monitoring wells TMW01 through TMW04, respectively. Groundwater monitoring continued on a quarterly basis. The monitoring well locations are depicted on the Site Map provided as Figure 2. Field boring logs with well completion diagrams are attached.

On March 14, 2016, monitoring wells MW01 through MW04 were surveyed to obtain the relative groundwater and top-of-casing well elevation data. The survey data indicated the groundwater flow direction at the site is to the north-northeast. On November 3, 2016, replacement monitoring wells TMW01 through TMW04 were surveyed to obtain the relative groundwater and top-of-casing well elevation data. The survey data confirmed the groundwater flow direction at the site is to the north-northeast. Relative groundwater elevations are provided in Table 2. Groundwater Elevation Contour Maps for the March 2016 survey event and the first quarter 2016, fourth quarter 2016, and first quarter 2017 monitoring events are provided as Figures 3A through 3D.

As of the April 2017 quarterly monitoring event, BTEX concentrations in wells MW01/TMW01 through MW04/TMW04, are compliant with COGCC allowable levels for four consecutive quarterly monitoring events. The groundwater analytical results are summarized in Table 2. The analytical reports for the four compliant groundwater monitoring events are attached.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Final Report

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report

Other NFA Status Request

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:

NA

Volume of E&P Waste (solid) in cubic yards 95

E&P waste (solid) description Petroleum hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Front Range Regional Landfill in Erie, Colorado

Volume of E&P Waste (liquid) in barrels 120

E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: 159443

Non-COGCC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? _____

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

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.

The hammer union was repaired and the site was restored to its pre-release grade. The Kerr-McGee well remains at the site.

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. 03/24/2014

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/24/2014

Date of commencement of Site Investigation. 03/24/2014

Date of completion of Site Investigation. 10/28/2016

REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/24/2014

Date of completion of Remediation. 04/05/2017

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

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

Signed: Phil Hamlin _____

Title: Senior HSE Representative _____

Submit Date: 05/24/2017 _____

Email: Phil.Hamlin@Anadarko.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: PETER GINTAUTAS _____

Date: 06/01/2017 _____

Remediation Project Number: 9046 _____

COA Type**Description**

	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or further remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
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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**

401280370	FORM 27-SUPPLEMENTAL-SUBMITTED
401280399	LOGS
401292289	ANALYTICAL RESULTS
401292294	SOIL SAMPLE LOCATION MAP
401292296	SITE MAP
401292297	GROUND WATER ELEVATION MAP

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)