

State of Colorado Oil and Gas Conservation Commission

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401395702

Receive Date:

09/18/2017

Report taken by:

RICK ALLISON

Site Investigation and Remediation Workplan (Initial 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 Phone: <u>(970) 336-3500</u> Mobile: <u>()</u>
Address: <u>P O BOX 173779</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>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10503Initial Form 27 Document #: 401395702

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input checked="" 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 checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input 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>SPILL OR RELEASE</u>	Facility ID: <u>451306</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Thompson 13-33</u>		Latitude: <u>40.349113</u>	Longitude: <u>-104.905567</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>33</u>	Twp: <u>5N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use Agriculture and ResidentialIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Surface water and wetlands approximately 800 feet (ft) west, occupied building approximately 330 ft west-southwest, livestock approximately 400 ft southwest, and excavation groundwater approximately 2 to 4 ft below ground surface (bgs).

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	See attached data	Groundwater Samples/Lab Analysis
Yes	SOILS	43ft E-W x 16ft N-S x 4ft bgs	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.

Upon excavating a surface stain at the Thompson 13-33 tank battery facility, a dump line with a corrosion hole was encountered. The volume of the release is unknown. The petroleum hydrocarbon impacted soil was excavated.

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):

Between June 26 and 29, 2017, nine soil samples were collected from the excavation and submitted for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), pH, and specific conductivity (EC). Analytical results indicated that BTEX, TPH, pH, and EC concentrations and levels were compliant with Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the lateral extent of the excavation. The excavation dimensions 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. The analytical reports are attached.

Proposed Groundwater Sampling

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

On June 26, 2017, one groundwater sample (GW01) was collected from the excavation and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated that the benzene concentration exceeded the COGCC Table 910-1 allowable level at a concentration of 1,320 micrograms per liter (µg/L). On June 30, 2017, following the removal of approximately 150 barrels of impacted groundwater from the excavation, sample GW02 was collected for BTEX analysis. Laboratory analytical results for GW02 indicated that benzene exceeded the COGCC allowable level at a concentration of 16.4 µg/L. The excavation groundwater sample locations are depicted on Figure 1. The groundwater sample analytical results are summarized in Table 2. The analytical reports are attached.

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 9

Number of soil samples exceeding 910-1 3

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

Approximate areal extent (square feet) 690

NA / ND

-- Highest concentration of TPH (mg/kg) 3795

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 4

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 2'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 1320

-- Highest concentration of Toluene (µg/l) 273

-- Highest concentration of Ethylbenzene (µg/l) 60.8

-- Highest concentration of Xylene (µg/l) 800

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?

A background soil sample was collected. Laboratory analytical results indicated that pH and EC levels were compliant with COGCC Table 910-1 allowable levels at the extent of the excavation; therefore, the background soil sample was not submitted for laboratory analysis.

☐ 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?

Groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of the residual dissolved-phase groundwater impact.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 110 cubic yards of impacted soil were excavated and transported to Buffalo Ridge Landfill in Keenesburg, Colorado, for disposal. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. Based on excavation groundwater samples exceeding COGCC Table 910-1 allowable levels, approximately 150 barrels of impacted groundwater were removed from the excavation using a vacuum truck and transported to the Aggregate Recycle Facility in Weld County, Colorado. The general site layout and excavation footprint are depicted on the Excavation Site Map provided 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, 100 pounds of COGAC®, a carbon-based bioremediation product designed to capture and degrade petroleum hydrocarbons via chemical oxidation and passive bio-stimulation, were applied to the clean backfill in a series of lifts in the capillary and phreatic horizons.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

☒ Ex Situ

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 110
Name of Licensed Disposal Facility or COGCC Facility ID # _____
No _____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)
Yes _____ 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.

Groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of the residual dissolved-phase groundwater impact. The monitoring wells will be surveyed to determine the groundwater flow direction. Groundwater monitoring activities will be conducted on a quarterly schedule and samples will be submitted for laboratory analysis of BTEX.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other _____

Report Type: ☒ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report
☐ Other _____

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:

The petroleum hydrocarbon impacted groundwater was transported to the Aggregate Recycle Facility in Weld County, Colorado, to be recycled.

Volume of E&P Waste (solid) in cubic yards _____ 110

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

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Buffalo Ridge Landfill in Keenesburg, Colorado _____

Volume of E&P Waste (liquid) in barrels _____ 150

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

COGCC Disposal Facility ID #, if applicable: _____ 434766

Non-COGCC Disposal Facility: _____

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 excavation has been backfilled and restored to its pre-release grade. The Kerr-McGee tank battery will be reconstructed.

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 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. 06/27/2017

Actual Spill or Release date, if known. 06/27/2017

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/26/2017

Date of commencement of Site Investigation. 06/26/2017

Date of completion of Site Investigation.

REMEDIAL ACTION DATES

Date of commencement of Remediation. 06/27/2017

Date of completion of Remediation.

SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

OPERATOR COMMENT

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: 09/18/2017

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: RICK ALLISON

Date: 09/19/2017

Remediation Project Number: 10503

COA Type

Description

	Submit Annual Monitoring and Remediation Reports. Reports may be submitted more frequently, at Operator's option.
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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

401395702	FORM 27-INITIAL-SUBMITTED
401395742	ANALYTICAL RESULTS
401395821	SOIL SAMPLE LOCATION MAP

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)