

# State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401404191

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

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 3562

Initial Form 27 Document #: 1393864

#### 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: WELL	Facility ID:	API #: 123-16635	County Name: WELD
Facility Name: HSR-BLANK 15-5A	Latitude: 40.248397	Longitude: -104.799056	
** correct Lat/Long if needed: Latitude: 40.247937		Longitude: -104.792258	
QtrQtr: SWSE	Sec: 5	Twp: 3N	Range: 66W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

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

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

Water well approximately 1,200 feet (ft) southeast, wetlands and surface water approximately 50 ft north, livestock approximately 150 ft southeast, building approximately 920 ft south-southeast, and groundwater approximately 1 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	35ft N-S X 36ft E-W X 6ft 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.

THE LEAKING WATER SUMP WAS REMOVED AND A NEW WATER SUMP AND DUMP LINES WERE INSTALLED. IMPACTED SOIL WAS EXCAVATED AND IMPACTED GROUNDWATER WAS REMOVED.

## 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 ):

Please refer to the Form 27 submitted to the Colorado Oil and Gas Conservation Commission (COGCC) on November 29, 2005.

### Proposed Groundwater Sampling

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

Groundwater monitoring has been conducted on a quarterly basis since September 2005.

### 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 5  
Number of soil samples exceeding 910-1 1  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 1260

### NA / ND

-- Highest concentration of TPH (mg/kg) 1600  
NA Highest concentration of SAR           
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 196  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 1'  
Number of groundwater monitoring wells installed 6  
Number of groundwater samples exceeding 910-1 33

-- Highest concentration of Benzene (µg/l) 1700  
-- Highest concentration of Toluene (µg/l) 4000  
-- Highest concentration of Ethylbenzene (µg/l) 500  
-- Highest concentration of Xylene (µg/l) 10800  
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.

Please refer to the Form 27 submitted to the COGCC on November 29, 2005.

## 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.

As of the March 2010 quarterly monitoring event, monitoring well MW03 exceeded the Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable level for benzene at 260 micrograms per liter (µg/L). Following the March 2010 monitoring event, Kerr-McGee contracted LT Environmental, Inc. (LTE) to design and implement a carbon slurry injection program to remediate the residual dissolved-phase benzene, toluene, ethylbenzene, and total xylenes (BTEX) impacts to groundwater. Kerr-McGee submitted an Underground Injection Control (UIC) Permit Application to Region 8 of the United States Environmental Protection Agency (USEPA) on May 6, 2010, which was subsequently approved in a Rule Authorization: Aquifer Remediation Well approval letter from Region 8 dated May 25, 2010.

The carbon slurry injection program was implemented, as outlined in the UIC Permit Application, with the objective of reducing the residual dissolved-phase BTEX concentrations in the injection area surrounding monitoring well MW03 to less than the COGCC Table 910-1 allowable levels. In June 2010, LTE oversaw the injection of approximately 120 pounds (dry weight) of BOS 200® that was mixed with potable water and cultured facultative microbes to form an injectable carbon slurry. The BOS 200® product is designed to enhance petroleum hydrocarbon degradation by capturing the dissolved-phase petroleum hydrocarbons in a carbon matrix and promoting microbial metabolism of the hydrocarbons under both aerobic and anaerobic conditions. Post-injection groundwater monitoring continued on a quarterly basis. The June 2010 carbon slurry injection area is depicted on Figure 1.

Due to persistent, elevated benzene concentrations in monitoring well MW03, additional remedial options are under evaluation.

## 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) 210

Name of Licensed Disposal Facility or COGCC Facility ID # 149007

No Excavate and onsite remediation

\_\_\_\_\_ 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.

Groundwater monitoring wells MW03 through MW06 are sampled on a quarterly basis and submitted for laboratory analysis of BTEX by United States Environmental Protection Agency (USEPA) Method 8260C. Groundwater monitoring will continue on a quarterly basis. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the September 2017 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 2, and the laboratory analytical report for the September 2017 groundwater monitoring event is attached.

Monitoring well MW03 will be replaced and groundwater monitoring will continue on a quarterly basis until a No Further Action status request is warranted.

## 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:

Approximately 210 cubic yards of petroleum hydrocarbon impacted soil were transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 210

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

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_ 149007

Non-COGCC Disposal Facility: \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 80

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

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_ 159443

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No \_\_\_\_\_

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? No \_\_\_\_\_

Is additional groundwater monitoring to be conducted? Yes \_\_\_\_\_

## 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 site was restored to its pre-release grade. The Kerr-McGee facility remains at the site.

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. \_\_\_\_\_

Actual Spill or Release date, if known. 08/02/2005

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/02/2005

Date of commencement of Site Investigation. 08/03/2005

Date of completion of Site Investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 08/03/2005

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: \_\_\_\_\_

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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 3562

### COA Type

### Description

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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

401404209	LOGS
401441463	ANALYTICAL RESULTS
401441883	SITE MAP
401441885	GROUND WATER ELEVATION MAP

Total Attach: 4 Files

### General Comments

#### User Group

#### Comment

#### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)