

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

401460870

Receive Date:

12/11/2017

Report taken by:

PETER GINTAUTAS

## 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 &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b>
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 #: 10801 Initial Form 27 Document #: 401460870

#### 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 checked="" 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 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

Y Multiple Facilities ( in accordance with Rule 909.c. )

Facility Type: <u>LOCATION</u>	Facility ID: <u>306002</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SARCHET-63N66W 28NWSE</u>	Latitude: <u>40.194610</u>	Longitude: <u>-104.780080</u>	
** correct Lat/Long if needed: Latitude: <u>40.190078</u>		Longitude: <u>-104.782153</u>	
QtrQtr: <u>NWSE</u>	Sec: <u>28</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>318360</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DITLEV-SIMONSEN GAS UNIT-62N67W 31NWSW</u>	Latitude: <u>40.091980</u>	Longitude: <u>-104.938600</u>	
** correct Lat/Long if needed: Latitude: <u>40.090024</u>		Longitude: <u>-104.937754</u>	
QtrQtr: <u>NWSW</u>	Sec: <u>31</u>	Twp: <u>2N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>319527</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>JOHN GUNZNER GAS UNIT-TRU-63N67W 13NWSE</u>	Latitude: <u>40.221780</u>	Longitude: <u>-104.835130</u>	
** correct Lat/Long if needed: Latitude: <u>40.224115</u>		Longitude: <u>-104.835240</u>	
QtrQtr: <u>NWSE</u>	Sec: <u>13</u>	Twp: <u>3N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: LOCATION		Facility ID: 323634		API #:		County Name: WELD	
Facility Name: CAMP UPRR-63N66W 25NENE				Latitude: 40.201806		Longitude: -104.718567	
				** correct Lat/Long if needed: Latitude: 40.201795		Longitude: -104.718332	
QtrQtr: NENE	Sec: 25	Twp: 3N	Range: 66W	Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION		Facility ID: 327875		API #:		County Name: WELD	
Facility Name: P&M PALOMBO UNIT-63N67W 23SEnw				Latitude: 40.213930		Longitude: -104.862520	
				** correct Lat/Long if needed: Latitude: 40.210908		Longitude: -104.860524	
QtrQtr: SENW	Sec: 23	Twp: 3N	Range: 67W	Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION		Facility ID: 327980		API #:		County Name: WELD	
Facility Name: PALOMBO-63N67W 23NENW				Latitude: 40.215730		Longitude: -104.860930	
				** correct Lat/Long if needed: Latitude: 40.212468		Longitude: -104.858337	
QtrQtr: NENW	Sec: 23	Twp: 3N	Range: 67W	Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION		Facility ID: 330513		API #:		County Name: WELD	
Facility Name: DITLEV SIMONSEN GAS UNIT-62N67W 31NWSW				Latitude: 40.093140		Longitude: -104.938950	
				** correct Lat/Long if needed: Latitude: 40.090075		Longitude: -104.937712	
QtrQtr: NWSW	Sec: 31	Twp: 2N	Range: 67W	Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION		Facility ID: 331832		API #:		County Name: WELD	
Facility Name: PARKER-62N67W 15NESW				Latitude: 40.136920		Longitude: -104.878340	
				** correct Lat/Long if needed: Latitude: 40.134690		Longitude: -104.879574	
QtrQtr: NESW	Sec: 15	Twp: 2N	Range: 67W	Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION		Facility ID: 332085		API #:		County Name: WELD	
Facility Name: RUSCH-63N67W 15NESE				Latitude: 40.224180		Longitude: -104.869100	
				** correct Lat/Long if needed: Latitude: 40.222299		Longitude: -104.872853	
QtrQtr: NESE	Sec: 15	Twp: 3N	Range: 67W	Meridian: 6	Sensitive Area? Yes		

Facility Type: TANK BATTERY		Facility ID: 445306		API #:		County Name: WELD	
Facility Name: Waddle-63N67W 24SEnw				Latitude: 40.213030		Longitude: -104.841270	
				** correct Lat/Long if needed: Latitude: 40.213068		Longitude: -104.841364	
QtrQtr: SENW	Sec: 24	Twp: 3N	Range: 67W	Meridian: 6	Sensitive Area? Yes		

## SITE CONDITIONS

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

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

NA

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

☐ E&P Waste

☐ Other E&P Waste

☒ Non-E&P Waste

☐ Produced Water

☐ Workover Fluids

No Waste Generated

☐ 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 Sump Closure Reports.	Groundwater sample results provided, if applicable.
Yes	SOILS	See attached Sump Closure Reports.	Soil sample results provided.

### 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 objective of the soil and groundwater (if present) sampling was to determine if petroleum hydrocarbon impact to the subsurface media resulted from Kerr-McGee operating a produced water sump at the site.

### 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 ):

Soil sampling was conducted to determine if petroleum hydrocarbon impact to subsurface soil resulted from Kerr-McGee operating a produced water sump at the respective sites. For each sump closure site, one or more soil samples were collected for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), total petroleum hydrocarbons (TPH), pH, and specific conductivity (EC). The soil sampling activities, laboratory analytical results, and conclusions will be summarized in a Sump Closure Report for each site.

#### Proposed Groundwater Sampling

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

If groundwater was encountered in the sump excavation, a groundwater sample was collected and submitted for laboratory analysis of BTEX. The groundwater sampling activities will be summarized in the Sump Closure Reports, as applicable.

#### 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 15

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 435

### NA / ND

-- Highest concentration of TPH (mg/kg) 1890

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 15

### Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 4'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 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 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

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Soil samples were collected from the sump excavation for laboratory analysis of TPH, BTEX, pH, and EC. Impacted soil, if encountered, was transported to either the Kerr-McGee Land Treatment Facility in Weld County, Colorado, or to a licensed disposal facility, as applicable.

## 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.

Source removal, as applicable, completed at the sump closure sites will be summarized in the Sump Closure Reports. Groundwater impact was not encountered. No further action is required for these sites.

## 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) \_\_\_\_\_ 100  
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

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
No \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Air sparge / Soil vapor extraction  
No \_\_\_\_\_ Natural Attenuation  
No \_\_\_\_\_ 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.

NA

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Water Vessel Closure

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

☒ Other Water Vessel Closure

### 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 100

E&P waste (solid) description Petroleum hydrocarbon impacted soil at Camp UPRR 41-25A

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

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

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description \_\_\_\_\_

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

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.

Sump closure sites have been reclaimed (interim) or are in the process of being reclaimed (final) in accordance with COGCC 1000 Series Reclamation 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 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. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/04/2016

Date of commencement of Site Investigation. 11/04/2016

Date of completion of Site Investigation. 04/25/2017

### REMEDIAL ACTION DATES

Date of commencement of Remediation. \_\_\_\_\_

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: 12/11/2017

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: 12/19/2017

Remediation Project Number: 10801

### COA Type

### Description

	Submit reports of site investigation and progress of remediation including results of sampling and analysis on an annual basis or more often until remediation is closed.
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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

401460870	FORM 27-INITIAL-SUBMITTED
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Total Attach: 1 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	coordinates provided for HSR-David Sarchet -63N66W (330052) are at the coordinates of spill 442215 and Remediation 9282 (both closed) which are associated in CODCC database with location 306002 (SARCHET-63N66W /28NWSE ). changed location for this site investigation to 306002	12/19/2017
Environmental	COGCC location submitted (329568) Waddle is at coordinates of the COGCC facility 445306 tank battery (Waddle-63N67W /24SENW) and facility changed to that of the specific tank battery where the site investigation is occurring instead of the location.	12/19/2017

Total: 2 comment(s)