

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

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Report taken by:

CHRIS CANFIELD

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 #: 9149 Initial Form 27 Document #: 2314937

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>SPILL OR RELEASE</u>	Facility ID: <u>441608</u>	API #: _____	County Name: <u>ADAMS</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>39.899697</u>	Longitude: <u>-104.749990</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNW</u>	Sec: <u>11</u>	Twp: <u>2S</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC 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

A water well is located approximately 590 feet (ft) north, surface water is located approximately 180 ft north, an occupied building is located approximately 600 ft north, and groundwater is present approximately 5 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	Groundwater Samples/Lab Results
Yes	SOILS	23' N-S x 15' E-W x 7' bgs	Soil Samples/Lab Results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

During an inspection of the HSR-Van Schaack-62S66W/11NWNW tank battery, oil and produced water were discovered on the ground surface near the separator resulting from a line failure. Approximately 2 barrels (bbls) of crude oil and produced water were released within the unlined separator containment. Approximately 0.5 bbls of crude oil and produced water were recovered using a vacuum truck. The petroleum hydrocarbon impacted soil was excavated. A topographic Site Location Map showing the general location of the release is attached as Figure 1.

A No Further Action (NFA) Status Request was originally submitted to the Colorado Oil and Gas Conservation Commission (COGCC) on December 16, 2016.

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 April 9 and 10, 2015, six soil samples were collected from the excavation sidewalls and submitted for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), pH, and specific conductance (EC). Laboratory analytical results indicated that TPH, BTEX, pH, and EC concentrations and levels were in full compliance with the COGCC Table 910-1 allowable levels at the lateral extent of the excavation. The soil sample locations are depicted on Figure 2. The analytical results are summarized on Table 1.

Proposed Groundwater Sampling

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

On April 9, 2015, a representative groundwater sample (GW01) was collected from the excavation and submitted for BTEX analysis. Laboratory analytical results indicated that BTEX concentrations exceeded the COGCC Table 910-1 allowable levels at concentrations of 14,500 micrograms per liter (µg/L), 54,500 µg/L, 2,390 µg/L, and 26,200 µg/L, respectively. On April 23, 2015, following the removal of impacted groundwater, a second groundwater sample (GW02) was collected from the excavation. Laboratory analytical results for groundwater sample GW02 indicated that benzene, toluene, and total xylenes concentrations exceeded the COGCC Table 910-1 allowable levels at concentrations of 3,120 µg/L, 6,570 µg/L, and 4,150 µg/L, respectively. The excavation groundwater sample locations are depicted on Figure 2. 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 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 345

NA / ND

-- Highest concentration of TPH (mg/kg) 25900
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 5

Groundwater

Number of groundwater samples collected 37
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 5'
Number of groundwater monitoring wells installed 8
Number of groundwater samples exceeding 910-1 3

-- Highest concentration of Benzene (µg/l) 14500
-- Highest concentration of Toluene (µg/l) 54500
-- Highest concentration of Ethylbenzene (µg/l) 2390
-- Highest concentration of Xylene (µg/l) 26200
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.

Approximately 90 cubic yards of impacted soil were removed from the excavation and transported to Buffalo Ridge Landfill in Keenesburg, Colorado. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the groundwater table due to past seasonal fluctuations. Approximately 240 barrels of impacted groundwater were removed from the excavation and transported to a licensed injection facility for disposal. The general site layout and excavation footprint are depicted on Figure 2.

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.

Prior to backfilling the excavation, 400 pounds of COGAC®, a carbon-based remediation product designed to capture and degrade petroleum hydrocarbons via chemical oxidation and passive bio-stimulation, were applied with the clean backfill in a series of lifts through the capillary and phreatic horizons.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	Yes _____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) _____ 90
_____ 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)
Yes _____	Chemical oxidation
No _____	Air sparge / Soil vapor extraction
Yes _____	Natural Attenuation
Yes _____	Other _____ Groundwater Removal and COGAC® Application

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.

Monitoring wells MW01 through MW07 were installed between August 2015 and January 2016. Groundwater monitoring continued on a quarterly basis. Monitoring well MW06 was destroyed and replaced with monitoring well MW06R in August 2016. Field boring logs with well completion diagrams are attached. The monitoring well locations are depicted on Figure 3.

On September 1, 2015, 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 west-southwest. On February 17, 2016, monitoring wells MW05 through MW07 were tied in to the survey data. The survey data confirmed the groundwater flow direction at the site was to the west-southwest. Relative groundwater elevations are provided in Table 2. Groundwater Elevation Contour Maps for the first quarter 2016 through fourth quarter 2016 monitoring events are provided as Figures 4A through 4D, respectively.

As of the November 2016 quarterly monitoring event, BTEX concentrations in wells MW01 through MW07 were compliant with COGCC Table 910-1 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 90

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 240

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 site was restored to its pre-release grade. The Kerr-McGee production facility was deconstructed.

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. 04/10/2015

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/09/2015

Date of commencement of Site Investigation. 04/09/2015

Date of completion of Site Investigation. 02/10/2016

REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/10/2015

Date of completion of Remediation. 11/23/2016

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

The original NFA Status Request was submitted to the COGCC as a letter report on December 16, 2016. We are re-submitting the NFA Status Request in the new eForm 27 format, and we are including the original NFA Status Request as an attachment, per COGCC's request.

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: 03/19/2018

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: CHRIS CANFIELD

Date: 03/27/2018

Remediation Project Number: 9149

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**

401559344	FORM 27-SUPPLEMENTAL-SUBMITTED
401559352	MAP
401559354	SOIL SAMPLE LOCATION MAP
401559357	SITE MAP
401559374	LOGS
401559392	ANALYTICAL RESULTS
401578378	GROUND WATER ELEVATION MAP
401579151	SITE INVESTIGATION REPORT

Total Attach: 8 Files

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

Environmental	The Colorado Oil & Gas Conservation Commission (COGCC) has reviewed and hereby approves your 03/12/2018 request for a determination of No Further Action at the above-referenced location. However, should future conditions indicate that contaminant concentrations in soils exceed COGCC standards, or if ground water is found to be impacted, further investigation and/or remediation activities could be required. Remediation Project 3692 will be closed in the COGIS database. Note that surface reclamation must meet the COGCC 1004 series rules.	03/27/2018
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Total: 1 comment(s)