

# State of Colorado Oil and Gas Conservation Commission

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



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Receive Date:

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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 &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>Phillip Hamlin</u>	Email: <u>Phil.Hamlin@anadarko.com</u>	Mobile: <u>(970) 515-1161</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9871 Initial Form 27 Document #: 200440422

#### 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 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 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>445916</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>40.267376</u>	Longitude: <u>-104.825587</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWSW</u>	Sec: <u>31</u>	Twp: <u>4N</u>	Range: <u>66W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Crop land

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

#### Other Potential Receptors within 1/4 mile

An occupied building is located approximately 1,035 feet northwest of the release location.

## 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 checked="" 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 sampling and laboratory analysis
Yes	SOILS	32' (E-W) x 41' (N-S) x 11' bgs	Excavation, soil sampling, and laboratory 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.

On May 25, 2016, historical hydrocarbon impacts were discovered beneath the produced water sump during abandonment activities at the HSR-Hall 64N66W31NWSW production facility. The facility was shut in, associated infrastructure removed, and excavation activities were initiated. Groundwater was encountered in the excavation at approximately 11 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 445916 for this release. A partially-buried produced water vessel was removed during excavation activities.

### 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 samples were collected as described in the Initial Form 27. Based on the data presented, impacted soils in the excavation were remediated to be in full compliance with State standards.

#### Proposed Groundwater Sampling

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

Between October 21, 2016 and February 22, 2018, fourteen (14) temporary monitoring wells (BH01-BH14) were installed at the site to further assess the extent of groundwater impacts. Quarterly groundwater sampling was initiated on November 30, 2016, and is ongoing. Groundwater samples are collected from the temporary monitoring wells on a quarterly basis and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX). Groundwater analytical data is presented in Table 1, and the groundwater sample locations are illustrated on Figure 1. Laboratory analytical reports are included as Attachment A.

#### 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 ):

As described in the Initial Form 27 and associated attachments, a partially-buried produced water vessel was removed during excavation activities.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 9  
Number of soil samples exceeding 910-1 1  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 1272

### NA / ND

-- Highest concentration of TPH (mg/kg) 3530  
NA Highest concentration of SAR           
BTEX > 910-1 No  
Vertical Extent > 910-1 (in feet) 11

### Groundwater

Number of groundwater samples collected 72  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 11'  
Number of groundwater monitoring wells installed 14  
Number of groundwater samples exceeding 910-1 25

-- Highest concentration of Benzene (µg/l) 95.9  
-- Highest concentration of Toluene (µg/l) 10100  
-- Highest concentration of Ethylbenzene (µg/l) 602  
-- Highest concentration of Xylene (µg/l) 11100  
NA Highest concentration of Methane (mg/l)         

### Surface Water

0 Number of surface water samples collected  
0 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?

Impacted groundwater has been detected in off-site temporary groundwater monitoring wells BH08, BH10, BH11, and BH13.

☐ 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?

Hydrocarbon impacted groundwater remains at the site. The 14 temporary groundwater monitoring wells will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with State standards for four consecutive quarters. Additional temporary groundwater monitoring wells will be installed to maintain point-of-compliance (POC).

# 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.

Between May 25 and May 31, 2016, approximately 220 cubic yards of impacted material were excavated and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Approximately 80 barrels of impacted groundwater were removed from the excavation area via vacuum truck and transported to a licensed disposal facility.

## 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.

Laboratory data indicate that impacted soils in the excavation area have been remediated to be in full compliance with State standards. Prior to backfilling, approximately 220 pounds of activated carbon were added to the groundwater within the excavation area to mitigate remaining hydrocarbon impacts in groundwater. Quarterly groundwater monitoring is ongoing and will be continued until concentrations remain in full compliance with State standards for four consecutive quarters. Additional remediation measures, including air sparging and enhanced fluid recovery, are currently under evaluation to address remaining groundwater impacts. Estimated time to attain NFA is TBD based on the review of groundwater concentrations, the extent of impacted groundwater, and the efficacy of selected remedial technologies.

## 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) 220  
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  
Yes \_\_\_\_\_ Natural Attenuation  
Yes \_\_\_\_\_ Other Groundwater removal, activated carbon adsorption \_\_\_\_\_

## 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.

Between October 21, 2016 and February 22, 2018, a total of 14 temporary groundwater monitoring wells (BH01 - BH14) were installed at the site to assess the extent of groundwater impacts. The temporary groundwater monitoring wells will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with State standards for four consecutive quarters. Additional temporary groundwater monitoring wells will be installed to maintain POC. Groundwater sample locations are illustrated on Figure 1, and a potentiometric surface contour map for the Second Quarter 2018 is presented as Figure 2. Well completion logs for the temporary monitoring wells are included as Attachment B.

## REMEDATION 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:

NA

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 220

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

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

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

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

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

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

Non-COGCC Disposal Facility: Licensed disposal facility

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

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

Do all soils meet Table 910-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

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? \_\_\_\_\_

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

## 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 has been restored to its pre-release grade. Kerr-McGee will consult with the surface owner to determine reclamation specifics to properly conduct reclamation activities in accordance with COGCC 1000 Series 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. 05/27/2016

Actual Spill or Release date, if known. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 05/25/2016

Date of commencement of Site Investigation. 05/25/2016

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

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 05/25/2016

Date of completion of Remediation. \_\_\_\_\_

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

This eForm 27 is being submitted in response to the Conditions of Approval (COA) issued by the COGCC for Document No. 401391075, which requested that an additional Supplemental Form 27 be submitted within the first six months of 2018 to evaluate the need for additional monitoring wells downgradient of BH11.

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

Signed: ` Phillip Hamlin

Title: Senior HSE Representative

Submit Date: ` 05/01/2018

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: PETER GINTAUTAS

Date: 05/01/2018

Remediation Project Number: 9871

**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. Based on the analytical data and groundwater elevation map provided there are not poins of compliance established downgradient of BH13 which was recently added. In the next annual report provide documentation of revised monitoring plan to address establishment of points of compliance if not already in place.
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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**

401596450	FORM 27-SUPPLEMENTAL-SUBMITTED
401612108	GROUND WATER SAMPLE LOCATION
401612110	GROUND WATER ELEVATION MAP
401612112	ANALYTICAL RESULTS
401612115	ANALYTICAL RESULTS
401614059	LOGS

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)