

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
401591571
Receive Date:
08/09/2018

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 INFORMATON

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>		Mobile: <u>()</u>
Contact Person: <u>Phil Hamlin</u>	Email: <u>Phil.Hamlin@anadarko.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 4292 Initial Form 27 Document #: 1983837

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 checked="" type="checkbox"/> Other <u>Monitoring Well Reduction Request</u>

SITE INFORMATION N Multiple Facilites (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>328940</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-DIEFENBACH-64N66W 34NWSE</u>	Latitude: <u>40.266860</u>	Longitude: <u>-104.761290</u>	
	** correct Lat/Long if needed: Latitude: <u>40.264154</u>	Longitude: <u>-104.759954</u>	
QtrQtr: <u>NWSE</u>	Sec: <u>34</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 SP Most Sensitive Adjacent Land Use Wetlands and Surface Water

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 approximately 500 feet (ft) south, surface water (unlined irrigation canal) approximately 50 ft south, wetlands approximately 100 ft north, an occupied building approximately 920 ft south, livestock approximately 225 ft south, and groundwater approximately 1 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 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 Analysis
Yes	SOILS	15' NW-SE x 12' NE-SW x 4' 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.

In March 2008, the production well produced more water than anticipated, resulting in the partially-buried produced water sump to overflow and spill approximately 4 barrels (bbls) of produced water onto the ground surface within the earthen containment berm. A vacuum truck was used to recover approximately 4 bbls of produced water from the ground surface. 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):

Please refer to the Form 27 submitted to the Colorado Oil and Gas Conservation Commission (COGCC) on July 18, 2008.

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 April 2008.

Proposed Surface Water Sampling

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

Please refer to the Form 27 submitted to the COGCC on July 18, 2008.

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 7
Number of soil samples exceeding 910-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 180

NA / ND

-- Highest concentration of TPH (mg/kg) 6600
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 1

Groundwater

Number of groundwater samples collected 420
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 1'
Number of groundwater monitoring wells installed 32
Number of groundwater samples exceeding 910-1 119

-- Highest concentration of Benzene (µg/l) 4360
-- Highest concentration of Toluene (µg/l) 420
-- Highest concentration of Ethylbenzene (µg/l) 3200
-- Highest concentration of Xylene (µg/l) 55000
NA Highest concentration of Methane (mg/l)

Surface Water

1 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?

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 July 18, 2008.

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.

Please refer to the Form 27 submitted to the COGCC on July 18, 2008. Additional remedial options are under evaluation.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 25

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007

_____ 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)

No _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____ MicroBlaze® 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.

Since the submittal of the Form 27 to the COGCC on July 18, 2008, seventeen additional monitoring wells (MW04 through MW20) and twelve replacement monitoring wells (MW03R, MW05R, MW05R2, MW07R, MW08R, MW08R2, MW09R, MW09R2, MW09R3, MW10R, MW11R, and MW12R) were installed at the site. Monitoring wells MW09R2, MW11, and MW12R were removed from the groundwater monitoring program, as approved by the COGCC in the letter dated June 8, 2011, and the electronic mail dated August 28, 2015. Monitoring wells MW09R2 and MW11 were subsequently returned to the monitoring program in 2016. Boring logs with well completion diagrams are attached.

Groundwater monitoring wells MW01, MW02, MW03R, MW04, MW05R2, MW06, MW07R, MW08R2, MW09R3, MW10R, MW11R, and MW13 through MW20 are sampled on a quarterly basis and submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX). The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map for the April 2018 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical report for the April 2018 groundwater monitoring event is attached.

Groundwater monitoring will continue on a quarterly basis until a No Further Action status request is warranted.

Based on the groundwater analytical data to date, Kerr-McGee requests a reduction in the number of monitoring wells included in the groundwater monitoring program. BTEX concentrations have been compliant with COGCC Table 910-1 allowable levels for five or more consecutive quarterly groundwater monitoring events in monitoring wells MW11R, MW19, and MW20. Additionally, none of these wells currently serve or are needed as a POC well.

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 soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards _____ 25

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 _____ 0

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

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 production 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. 03/14/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/14/2008

Date of commencement of Site Investigation. 03/18/2008

Date of completion of Site Investigation. 01/18/2017

REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/14/2008

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: 08/09/2018

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: 08/09/2018

Remediation Project Number: 4292

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.

<u>Att Doc Num</u>	<u>Name</u>
401591571	FORM 27-SUPPLEMENTAL-SUBMITTED
401591586	LOGS
401644299	ANALYTICAL RESULTS
401648524	GROUND WATER ELEVATION MAP
401671776	SITE MAP

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)