

State of Colorado  
Oil and Gas Conservation Commission

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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 INFORMATON

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 #: 10048 Initial Form 27 Document #: 401177410

**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 Facilites ( in accordance with Rule 909.c. )

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>448259</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.231807</u>	Longitude: <u>-104.801408</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>17</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

**SITE CONDITIONS**

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Non-Crop Land

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? Yes

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

An occupied building is located approximately 115 feet southwest 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	100' (N-S) x 103' (E-W) x 10' bgs	Excavation, soil boring, 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 November 1, 2016, historical impacts were discovered during abandonment activities at the Tuttle L 63N66W/17SEW production facility. The facility was shut in, associated infrastructure was removed, and excavation activities were initiated. Groundwater was encountered in the excavation area at approximately 10 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 448259 for this release.

## 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 from the final lateral extent of the excavation area, and from ten (10) exploratory soil borings (BH01 - BH10), as described in the Initial Form 27. Based on the data presented, impacted soils in the excavation area were remediated to be in full compliance with COGCC standards, with the exception of additional impacted soil that was left in-place to the north of the previously excavated area, due to the presence of overhead utilities. Soil boring sample locations, the previous excavation area, and the estimated extent of remaining soil impacts are illustrated on Figure 1.

### Proposed Groundwater Sampling

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

Between November 21, 2016 and August 3, 2017, twelve (12) temporary monitoring wells (BH01, BH01R, BH02, BH02R, BH04, BH08 - BH14) were installed to assess the extent of groundwater impacts. Quarterly groundwater sampling was initiated on November 23, 2016, and is ongoing at the 10 temporary monitoring wells remaining at the site; wells BH01 and BH02 were destroyed and subsequently replaced by BH01R and BH02R, respectively. 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 2. Laboratory analytical reports are provided 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 ):

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 25  
Number of soil samples exceeding 910-1 8  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 7000

### NA / ND

-- Highest concentration of TPH (mg/kg) 1752  
NA Highest concentration of SAR           
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 10

### Groundwater

Number of groundwater samples collected 64  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 10'  
Number of groundwater monitoring wells installed 12  
Number of groundwater samples exceeding 910-1 27

-- Highest concentration of Benzene (µg/l) 14000  
-- Highest concentration of Toluene (µg/l) 1400  
-- Highest concentration of Ethylbenzene (µg/l) 618  
-- Highest concentration of Xylene (µg/l) 8040  
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?

During excavation activities, soil impacts were observed on the adjacent property east of the Tuttle L 63N66W/17SEW production facility. The excavation was advanced onto the adjacent property to remove hydrocarbon impacted soil. Soil samples collected from the final extent of the east sidewall of the excavation were in full compliance with COGCC standards. In addition, off-site soil impacts were identified during advancement and sampling of soil borings BH01, BH03, and BH06, as shown on Figure 1. Impacted groundwater has been detected in off-site temporary groundwater monitoring wells BH04 and BH09.

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 soil and groundwater remain at the site. The 10 temporary groundwater monitoring wells remaining at the site (BH01R, BH02R, BH04, BH08 - BH14) will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with COGCC standards for four consecutive quarters. Additional confirmation soil samples will be collected from the final impacted soil extent, subsequent to the completion of soil remediation activities north of the previous excavation area.

# REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes \_\_\_\_\_

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Between November 1 and 22, 2016, approximately 1,920 cubic yards of impacted soil were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado and the Buffalo Ridge landfill in Keenesburg, Colorado. Due to the presence of overhead utilities, excavation equipment was unable to access hydrocarbon impacted soils north of the previous excavation area. Approximately 40 barrels of impacted groundwater were removed from the excavation area and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado.

## 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 COGCC standards, with the exception of impacted soil north of the excavation in the vicinity of boreholes BH01, BH03, and BH06. Prior to backfilling, approximately 605 pounds of activated carbon were added to the groundwater within the previous excavation area to mitigate remaining hydrocarbon impacts in groundwater. Remaining impacted soil will be addressed through the implementation of additional targeted excavation under a phased approach. Quarterly groundwater monitoring is ongoing, and will be continued until concentrations remain in full compliance with COGCC standards for four consecutive quarters. Additional groundwater remediation activities will be evaluated as appropriate. Estimated time to attain NFA is TBD based on the groundwater concentrations, the extent of impacted soil and groundwater, and the efficacy of selected remedial technologies.

## Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 1920

\_\_\_\_\_ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_ 149007

\_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

No \_\_\_\_\_ Land Treatment

No \_\_\_\_\_ Bioremediation (or enhanced bioremediation)

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ 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 November 21, 2016 and August 3, 2017, a total of 12 temporary groundwater monitoring wells (BH01, BH01R, BH02, BH02R, BH04, BH08 - BH14) were installed at the site to assess the extent of groundwater impacts. The 10 temporary groundwater monitoring wells remaining at the site (BH01R, BH02R, BH04, BH08 - BH14) will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with COGCC standards for four consecutive quarters. Groundwater sample locations are illustrated on Figure 2, and a potentiometric surface contour map for the Fourth Quarter 2018 is presented as Figure 3. Boring logs for the temporary monitoring wells and exploratory borings completed at the site are included as Attachment B.

## 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:

NA

Volume of E&P Waste (solid) in cubic yards 1920

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable: 149007

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

Volume of E&P Waste (liquid) in barrels 40

E&P waste (liquid) description Hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: 434766

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? \_\_\_\_\_

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. 11/03/2016

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/01/2016

Date of commencement of Site Investigation. 11/01/2016

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

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 11/01/2016

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: Phillip Hamlin

Title: Senior HSE Representative

Submit Date: 12/11/2018

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: 12/11/2018

Remediation Project Number: 10048

### COA Type

### Description

<u>COA Type</u>	<u>Description</u>

## **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>
401839540	FORM 27-SUPPLEMENTAL-SUBMITTED
401839635	LOGS
401839640	GROUND WATER SAMPLE LOCATION
401839648	ANALYTICAL RESULTS
401839650	ANALYTICAL RESULTS
401859119	SOIL SAMPLE LOCATION MAP
401870044	GROUND WATER ELEVATION MAP

Total Attach: 7 Files

## **General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
	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.	12/11/2018

Total: 1 comment(s)