

State of Colorado Oil and Gas Conservation Commission

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Document Number:

401909990

Receive Date:

03/11/2019

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 & 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 #: 4493 Initial Form 27 Document #: 1944350

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 Facilities (in accordance with Rule 909.c.)

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>318506</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UPRR 53 PAN AM J-62N65W 11SWNE</u>		Latitude: <u>40.156061</u>	Longitude: <u>-104.627281</u>
** correct Lat/Long if needed: Latitude: <u>40.153336</u>		Longitude: <u>-104.621928</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>11</u>	Twp: <u>2N</u>	Range: <u>65W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Pasture and Agriculture

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

Water well approximately 175 feet (ft) east and groundwater approximately 8 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 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 Samples/Lab Analysis
Yes	SOILS	100' N-S X 120' E-W X 15' 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 January 2009, field crews encountered historical petroleum hydrocarbon impacted soil while removing the production tank and upgrading the tank battery at the UPRR 53 Pan Am J #1 facility. 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):

Between January 16 and February 4, 2009, 20 confirmation soil samples were collected from the excavation sidewalls. The soil samples were submitted for laboratory analysis of total petroleum hydrocarbons (TPH) by United States Environmental Protection Agency (USEPA) Method 8015. The analytical results confirmed that TPH concentrations were in full compliance with the Colorado Oil and Gas Conservation Commission (COGCC) sensitive area allowable level of 1,000 milligrams per kilogram (mg/kg) at the extent of excavation. The soil samples were not analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) as the samples were collected prior to the April 1, 2009, COGCC rule changes.

Proposed Groundwater Sampling

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

On January 16, 2009, an excavation groundwater sample (GW01) was submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results for sample GW01 indicated that concentrations of all four BTEX constituents exceeded the COGCC Table 910-1 allowable levels. Based on the analytical results, approximately 80 barrels of impacted groundwater were removed from the excavation and transported to a licensed injection facility for disposal. On February 5, 2009, 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 continued to exceed the COGCC allowable levels. Groundwater monitoring has been conducted on a quarterly basis since April 2009. The excavation groundwater sample locations are depicted on the Site Map provided as Figure 1. The groundwater sample analytical results are summarized in Table 1.

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 20

Number of soil samples exceeding 910-1 8

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

Approximate areal extent (square feet) 12000

NA / ND

-- Highest concentration of TPH (mg/kg) 4160

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 914

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 8'

Number of groundwater monitoring wells installed 31

Number of groundwater samples exceeding 910-1 235

-- Highest concentration of Benzene (µg/l) 11000

-- Highest concentration of Toluene (µg/l) 13000

-- Highest concentration of Ethylbenzene (µg/l) 9400

-- Highest concentration of Xylene (µg/l) 62000

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?

Groundwater impacts were detected in the adjoining pasture north of the tank battery.

☐ 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? Yes _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 4,500 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. The petroleum hydrocarbon impacted soil was excavated into the phreatic zone to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. Approximately 80 barrels of petroleum hydrocarbon impacted groundwater were removed from the excavation and transported to a licensed injection facility for disposal.

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, 15 gallons of MicroBlaze®, a concentrated solution of facultative microbes, nutrients, and surfactants designed to bioremediate petroleum hydrocarbons, were applied to the excavation groundwater.

Due to persistent, elevated BTEX concentrations in multiple site monitoring wells, an air sparging (AS) and soil vapor extraction (SVE) system was installed at the site to remediate the dissolved-phase petroleum hydrocarbon plume. On June 6 and 7, 2012, four pilot test wells (AS-1, AS-2, SVE-1, and SVE-2) and five observation wells (OB-1 through OB-5) were installed at the site. Pilot testing was conducted on June 27 through June 29, 2012. The results of the pilot testing program and a proposed design for a full-scale AS/SVE system were presented to the COGCC in the 'Proposed Remediation Work Plan' submitted on August 13, 2012.

Installation of the full-scale AS/SVE system occurred in October 2012. The system comprised of nineteen AS wells and nineteen SVE wells connected by a combination of surface and subsurface high-density polyethylene piping to a remediation trailer powered by an Arrow VRG330 (6-cylinder) natural gas engine. The remediation system included valves at all of the AS wellheads to allow for uninterrupted flow control, measurement, and adjustment. AS was accomplished using a 10-horsepower driven Rietschle Thomas DLR 100 rotary claw compressor and SVE was accomplished using a Roots 47 U-RAI DSL rotary lobe blower that were housed within the remediation trailer. Following a fully compliant quarter of groundwater results in October 2017, the AS/SVE system was shut down in November 2017. In the second quarter 2018, compliance for benzene was lost for well MW12. Additional remedial options are under evaluation to address the remaining benzene concentrations. The layout of the AS/SVE system is depicted on the Site Map attached as Figure 1.

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) _____ 4500
Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007
No _____ Excavate and onsite remediation
No _____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
Yes _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
Yes _____ Other Groundwater Removal and 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.

Groundwater monitoring wells MW01, MW02, MW04, MW05, and MW07 through MW20 are sampled on a quarterly basis and submitted for laboratory analysis of BTEX. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the January 2019 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical report for the last three groundwater monitoring events are attached.

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

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:

Approximately 4,500 cubic yards of petroleum hydrocarbon impacted soil were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 4500

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 80

E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: 159443

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 was reconstructed.

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. 01/12/2009

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/16/2009

Date of commencement of Site Investigation. 01/12/2009

Date of completion of Site Investigation. 04/10/2012

REMEDIAL ACTION DATES

Date of commencement of Remediation. 01/12/2009

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: 03/11/2019

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: 03/16/2019

Remediation Project Number: 4493

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

401909990	FORM 27-SUPPLEMENTAL-SUBMITTED
401923827	ANALYTICAL RESULTS
401924894	GROUND WATER ELEVATION MAP
401933423	SITE MAP

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

	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.	03/16/2019
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Total: 1 comment(s)