

State of Colorado Oil and Gas Conservation Commission

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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 Phone: <u>(720) 929-6000</u> Mobile: <u>(720) 929-4306</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u> Zip: <u>80217-3779</u>	
Contact Person: <u>Erik Mickelson</u>	Email: <u>Erik.Mickelson@anadarko.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9109 Initial Form 27 Document #: 2143459

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>Notification of replacement monitoring well installation</u> |

SITE INFORMATION

Y Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>439679</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>40.040111</u>	Longitude: <u>-104.872880</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NENE</u>	Sec: <u>22</u>	Twp: <u>1N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CL 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 800 feet east-northeast of the release location. A livestock holding pen is located approximately 1,020 feet southeast 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 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	31' (E-W) x 28' (N-S) x 10' 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 October 24, 2014, historical impacts were discovered during tank battery reconstruction activities at the Coughlin Red VV 22-1, 22-2 production facility, 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 439679 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 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.

Proposed Groundwater Sampling

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

Between April 1 and October 12, 2015, seven (7) temporary monitoring wells (BH01 - BH07) were installed to further assess the extent of groundwater impacts. Quarterly groundwater sampling was initiated on April 14, 2015, and was continued through January 23, 2018. Groundwater monitoring was temporarily placed on hold and the temporary monitoring wells were destroyed following the 1Q18 sampling event, due to the construction of a new well pad and production facility at this location. Tank battery reconstruction activities were completed in February 2019; replacement temporary monitoring wells will be installed, and groundwater sample collection and analysis for benzene, toluene, ethylbenzene, and total xylenes (BTEX) will be reinitiated. The proposed replacement monitoring well locations, with respect to the new infrastructure on-site, are illustrated on Figure 1. Historical groundwater analytical data is presented 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):

All temporary groundwater monitoring wells at the site (BH01 - BH07) were destroyed following the 1Q18 sampling event. Replacement temporary monitoring wells will be installed at the locations illustrated on Figure 1.

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) 750

NA / ND

-- Highest concentration of TPH (mg/kg) 67.3
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 81
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 10'
Number of groundwater monitoring wells installed 7
Number of groundwater samples exceeding 910-1 10

-- Highest concentration of Benzene (µg/l) 2620
-- Highest concentration of Toluene (µg/l) 1.5
-- Highest concentration of Ethylbenzene (µg/l) 170
-- Highest concentration of Xylene (µg/l) 704
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?

☐ 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?

Groundwater monitoring activities were placed on hold following the 1Q18 sampling event, pending the construction of a new well pad and production facility at this location. Tank battery reconstruction activities were completed in February 2019; replacement temporary groundwater monitoring wells will be installed, and groundwater monitoring activities will resume. The replacement temporary groundwater monitoring wells will 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. The proposed replacement monitoring well locations, with respect to the new infrastructure on-site, are illustrated on Figure 1.

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 October 24 and 27, 2014, approximately 200 cubic yards of impacted soil were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal. Approximately 80 barrels of impacted groundwater were removed from the excavation 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 COGCC standards. Prior to backfilling, approximately 264 pounds of activated carbon were added to the groundwater within the excavation area to mitigate remaining hydrocarbon impacts in groundwater. Quarterly groundwater monitoring events were placed on temporary hold, pending the construction of a new well pad and production facility at this location. Tank battery reconstruction activities were completed in February 2019; replacement temporary monitoring wells will be installed, and groundwater monitoring activities will resume. The replacement temporary groundwater monitoring wells will 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. Estimated time to attain NFA is TBD based on the 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) _____ 200
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 April 1 and October 12, 2015, a total of 7 temporary groundwater monitoring wells (BH01 - BH07) were installed at the site to assess the extent of groundwater impacts. All 7 groundwater monitoring wells were destroyed following the 1Q18 sampling event, due to the construction of a new well pad and production facility at this location. Tank battery reconstruction activities were completed in February 2019; replacement temporary monitoring wells will be installed, and groundwater monitoring activities will resume. Installation of the replacement temporary monitoring wells in the original locations is not possible, due to the new above- and below-ground site infrastructure. The proposed replacement temporary monitoring well locations are as close as possible to the original locations, and were selected to provide site-wide groundwater quality data as well as to maintain point-of-compliance (POC). The replacement temporary groundwater monitoring wells will 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. The proposed replacement monitoring well locations, with respect to the new infrastructure on-site, are illustrated on Figure 1. Historical groundwater analytical data is presented in Table 1.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Notification of replacement monitoring well installation

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report ☒ Other Notification of replacement monitoring well installation

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 200

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Front Range Landfill - Erie, 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. A new Kerr-McGee production facility has been constructed at the site. 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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/24/2014

Date of commencement of Site Investigation. 10/24/2014

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/24/2014

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

This Supplemental Form 27 is being prepared for the purpose of notifying the COGCC of replacement temporary monitoring well installation. As such, no additional groundwater monitoring results or analytical data are included herein. The replacement monitoring wells will 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. The proposed replacement monitoring well locations, with respect to the new infrastructure on-site, are illustrated on Figure 1. Historical groundwater analytical data is presented in Table 1.

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

Signed: Erik Mickelson

Title: Senior HSE Representative

Submit Date: 03/11/2019

Email: Erik.Mickelson@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: 03/18/2019

Remediation Project Number: 9109

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

401953254	FORM 27-SUPPLEMENTAL-SUBMITTED
401953388	ANALYTICAL RESULTS
401967752	GROUND WATER SAMPLE LOCATION

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)