

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
402018078
Receive Date:
04/24/2019

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>Gregory Hamilton</u>	Email: <u>Gregory.Hamilton@anadarko.com</u>	Mobile: <u>(970) 515-1698</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 12963 Initial Form 27 Document #: 401989945

PURPOSE INFORMATION

<input type="checkbox"/> 901.e. Sensitive Area Determination	<input 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 type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation	<input checked="" 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 Y Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>318921</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>C A FORD UNIT-62N66W 16SESE</u>	Latitude: <u>40.133730</u>	Longitude: <u>-104.776360</u>	
** correct Lat/Long if needed: Latitude: <u>40.133428</u>		Longitude: <u>-104.775249</u>	
QtrQtr: <u>SESE</u>	Sec: <u>16</u>	Twp: <u>2N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>463888</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.133560</u>	Longitude: <u>-104.775292</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>16</u>	Twp: <u>2N</u>	Range: <u>66W</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

A building is located approximately 920 feet southwest of the former sump 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
No	GROUNDWATER	No groundwater impacts encountered	Groundwater sample/laboratory analytical results
Yes	SOILS	68' (N-S) x 35' (E-W) x 7' bgs	Soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

This form has been prepared to provide notice of the closure of a partially buried produced water vessel (vessel) at this location. In accordance with COGCC Rule 905.b., soil samples and a groundwater sample (if present) will be collected following removal of the vessel to determine if soil and groundwater (if present) meet the concentrations levels of COGCC Table 910-1. Field screening of soils will be conducted during vessel removal 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):

Sixteen (16) confirmation soil samples were collected from the sidewalls and base of the final extent of the excavation area at depths of approximately 6 feet and 7 feet below ground surface (bgs), respectively. The base soil samples were submitted for laboratory analysis of BTEX, naphthalene, and total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260C, TPH-diesel range organics (DRO) and oil range organics (ORO) by USEPA Method 8015C, pH by USEPA Method 9045D, specific conductance (EC) by USEPA Method 9050A, and sodium adsorption ratio (SAR) by USDA Agricultural Handbook 60 Method 20B. The sidewall soil samples were submitted for laboratory analysis of BTEX, naphthalene, and TPH. Laboratory analytical results indicated that constituent concentrations in the soil samples collected from the final extent of the excavation area were 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):

Groundwater was encountered within the excavation at approximately 7 feet bgs. A groundwater sample (GW01) was collected and submitted to Origins Laboratory for analysis of BTEX by USEPA Method 8260C. Analytical results indicated that constituent concentrations in groundwater sample GW01 were in full compliance with COGCC standards.

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):

A topographic Site Location Map showing the geographic setting of the release is provided as Figure 1. Soil and groundwater sample locations are illustrated on Figure 2. Soil analytical results are summarized in Table 1 and groundwater analytical results are summarized in Table 2. The laboratory analytical reports are provided as Attachment A. A partially-buried produced water vessel was removed during facility abandonment activities.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 16
Number of soil samples exceeding 910-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1810

NA / ND

-- Highest concentration of TPH (mg/kg) 89.61
-- Highest concentration of SAR 17.52
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 7

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 7'
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 910-1 0

ND Highest concentration of Benzene (µg/l)
ND Highest concentration of Toluene (µg/l)
ND Highest concentration of Ethylbenzene (µg/l)
ND Highest concentration of Xylene (µg/l)
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?

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.

Approximately 520 cubic yards of impacted material were removed and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado 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.

Laboratory analytical results indicate that constituent concentrations in the soil samples collected from the final lateral and vertical extents of the excavation area were in full compliance with COGCC standards, except for the SAR values in base soil samples B01@7', B02@7', B03@7', B04@7', B05@7', and B06@7', which were collected below the root zone. Based on the analytical data presented herein, remediation is complete at this site and Kerr-McGee is requesting a No Further Action (NFA) determination for this release. E&P waste records of material transported off-site are kept on file and available upon request.

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) _____ 520
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

Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Final Report
Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other NFA Request and Produced Water Vessel Closure

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 520

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 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? Yes

Do all soils meet Table 910-1 standards? No

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? Yes

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

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 will be reclaimed in accordance with COGCC 1000 Series Reclamation 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. 04/10/2019

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/10/2019

Date of commencement of Site Investigation. 04/10/2019

Date of completion of Site Investigation. 04/15/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/10/2019

Date of completion of Remediation. 04/15/2019

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Based on the analytical data provided herein, Kerr-McGee is requesting an NFA determination for this location.

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

Signed: Gregory Hamilton

Title: Senior Staff Env Rep

Submit Date: 04/24/2019

Email: Gregory.Hamilton@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: 04/24/2019

Remediation Project Number: 12963

COA Type**Description**

--	--

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**

402018078	FORM 27-SUPPLEMENTAL-SUBMITTED
402018214	SITE MAP
402018232	ANALYTICAL RESULTS
402018494	ANALYTICAL RESULTS
402019648	MAP
402019705	ANALYTICAL RESULTS

Total Attach: 6 Files

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

Environmental	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or further remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.	04/24/2019
Environmental	added spill facility 463888 to this site investigation to link as spill closed with this remediation project	04/24/2019

Total: 2 comment(s)