

State of Colorado Oil and Gas Conservation Commission

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



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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 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@oxy.com</u>	Mobile: <u>(970) 515-1161</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9264 Initial Form 27 Document #: 200437395

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>SPILL OR RELEASE</u>	Facility ID: <u>442346</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>40.205743</u>	Longitude: <u>-104.826514</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>19</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 SW Most Sensitive Adjacent Land Use Non-Crop Land

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 livestock holding pen is located approximately 500 feet north of the release location. A building is located approximately 530 feet north 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	95' (E-W) x 75' (N-S) x 14' 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 July 1, 2015, historical impacts were discovered during abandonment activities at the Platteville 63N66W19SWSW production facility, and excavation activities were initiated. Groundwater was encountered in the excavation at approximately 6 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 442346 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 historical excavation as described in the Initial Form 27. Additional soil sampling was conducted during the engineered excavation and remediation activities completed at the site during 2019, as described herein. 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 October 28, 2015 and September 21, 2018, twenty (20) temporary monitoring wells (BH01 - BH19, BH09R) were installed to further assess the extent of groundwater impacts and/or for remediation purposes. Quarterly groundwater sampling was initiated on October 30, 2015, and is ongoing at the nineteen (19) monitoring wells remaining at the site. BH09 was noted destroyed on April 28, 2016, and was replaced with BH09R on May 13, 2016. Replacement monitoring wells have also been installed to replace wells BH01 - BH04, BH06, BH07, BH09R, and BH16, which were removed during the 2019 remediation activities. Groundwater samples are collected from the temporary monitoring wells on a quarterly basis and analyzed for BTEX. Quarterly groundwater monitoring analytical data is presented in Table 1, and the groundwater sample locations are illustrated on Figure 1. Laboratory analytical reports for the previous five quarters of groundwater monitoring are included 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 67

Number of soil samples exceeding 910-1 1

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

Approximate areal extent (square feet) 4360

NA / ND

-- Highest concentration of TPH (mg/kg) 862

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 14

Groundwater

Number of groundwater samples collected 198

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 9'

Number of groundwater monitoring wells installed 20

Number of groundwater samples exceeding 910-1 70

-- Highest concentration of Benzene (µg/l) 8480

-- Highest concentration of Toluene (µg/l) 18900

-- Highest concentration of Ethylbenzene (µg/l) 686

-- Highest concentration of Xylene (µg/l) 15300

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?

Impacted groundwater has been detected in off-site temporary groundwater monitoring wells BH12 and BH13.

☐ 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 groundwater may remain at the site. The 19 temporary groundwater monitoring wells remaining at the site 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.

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.

On July 1, 2015, approximately 230 cubic yards of impacted soil were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. Approximately 80 barrels of impacted groundwater were removed from the excavation area via vacuum truck and transported to a licensed disposal facility. Additional soil and groundwater removal and treatment activities were conducted in 2019, as described below.

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.

On November 23, 2015, LNAPL gauging and removal activities were initiated. A passive LNAPL bailer was installed in well BH09R on May 5, 2017, and bi-weekly LNAPL gauging and recovery events have been conducted at wells BH01, BH04, BH06, and BH09R. During 2019, remaining soil impacts from 2 - 14 ft bgs were treated in situ using chemical oxidant (chemox) soil mixing of impacted material with a dilute hydrogen peroxide solution. On-site excavation and chemox soil mixing activities were conducted from July 17 to August 2, 2019, to treat approximately 1,200 cubic yards of impacted soil. During excavation activities, approximately 1,820 barrels of groundwater were removed from the excavation area via vacuum truck and transported to the Kerr-McGee Aggregate Recycle Facility. Prior to backfilling, 302 pounds of OxPure® activated carbon were added to the groundwater in the excavation area to mitigate remaining hydrocarbon impacts in groundwater. The final remedial excavation extent and associated soil and groundwater sample locations are illustrated on Figure 3. The 2019 excavation soil sample analytical data is presented in Table 2, and the post-treatment confirmation soil sample analytical data is presented in Table 3. The excavation groundwater sample analytical results are presented in Table 4. The laboratory analytical reports for the samples collected during the 2019 remediation activities are included in Attachment A, and SDSs for the activated carbon and dilute hydrogen peroxide are provided as Attachment B. Additional remedial activities may be evaluated, as necessary, to address potential remaining hydrocarbon impacts in groundwater. Quarterly groundwater monitoring is ongoing and will be continued 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

No Bioremediation (or enhanced bioremediation)

Yes Chemical oxidation

No Air sparge / Soil vapor extraction

No Natural Attenuation

No Other _____

☒ Ex Situ

Yes Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) 230

Name of Licensed Disposal Facility or COGCC Facility ID # 149007

Yes Excavate and onsite remediation

No Land Treatment

No Bioremediation (or enhanced bioremediation)

Yes 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, LNAPL recovery, 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 October 28, 2015, and September 21, 2018, a total of 20 temporary monitoring wells (BH01 - BH19, BH09R) were installed at the site to assess the extent of groundwater impacts and/or for remediation purposes. The 19 temporary groundwater monitoring wells remaining at the site (BH09 was destroyed and was subsequently replaced with BH09R) 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. Replacement monitoring wells have been installed to replace wells BH01 - BH04, BH06, BH07, BH09R, and BH16, which were removed during the 2019 remediation activities. Groundwater sample locations are illustrated on Figure 1 and a potentiometric surface contour map for the Third Quarter 2019 is presented as Figure 2. Well completion logs for the temporary monitoring wells are included as Attachment C.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other _____

Report Type: ☒ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Remediation progress update _____

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 230

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels 1900

E&P waste (liquid) description Hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: 434766

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. 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. 07/02/2015

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/01/2015

Date of commencement of Site Investigation. 07/01/2015

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 07/01/2015

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

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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: 09/23/2019

Email: Phil_Hamlin@oxy.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: 09/23/2019

Remediation Project Number: 9264

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.

Att Doc Num**Name**

402125363	FORM 27-SUPPLEMENTAL-SUBMITTED
402154392	ANALYTICAL RESULTS
402154393	ANALYTICAL RESULTS
402154437	SOIL SAMPLE LOCATION MAP
402154460	ANALYTICAL RESULTS
402154463	ANALYTICAL RESULTS
402154469	ANALYTICAL RESULTS
402163966	ANALYTICAL RESULTS
402164099	GROUND WATER ELEVATION MAP
402164103	GROUND WATER SAMPLE LOCATION
402183301	OTHER
402183302	OTHER
402183358	LOGS

Total Attach: 13 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)