

State of Colorado
Oil and Gas Conservation Commission

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Receive Date:

Report taken by:

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: KERR MCGEE OIL & GAS ONSHORE LP	Operator No: 47120	Phone Numbers Phone: (970) 336-3500 Mobile: ()
Address: P O BOX 173779		
City: DENVER	State: CO Zip: 80217-3779	
Contact Person: Phil Hamlin	Email: Phillip_Hamlin@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 12024 Initial Form 27 Document #: 401814675

PURPOSE INFORMATION

- 901.e. Sensitive Area Determination
- 909.c.(1), Rule 905: Pit or PW vessel closure
- 909.c.(2), Rule 906: Spill/Release Remediation
- 909.c.(3), Rule 907.e.: Land treatment of oily waste
- 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure
- 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
- Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
- Rule 909.e.(2)B.: Closure of remediation project
- Rule 906.c.: Director request
- Other _____

SITE INFORMATION

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

Facility Type: SPILL OR RELEASE	Facility ID: 456515	API #: _____	County Name: WELD
Facility Name: SPILL/RELEASE POINT		Latitude: 40.262042	Longitude: -104.905178
		** correct Lat/Long if needed: Latitude: 40.262042	Longitude: -104.905178
QtrQtr: NENE	Sec: 5	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use Cropland

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

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 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	Defined by MW09, MW10, and MW11	Sampling and laboratory analysis
Yes	SOILS	45' (N-S) x 29' (E-W) x 15' 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 August 3, 2018, while rebuilding the WCR Properties 41-5/Spaur 1-5 tank battery, historical impacts were discovered beneath the separators. The petroleum hydrocarbon soil was excavated. Groundwater was encountered at 12 feet below ground surface in the excavation.

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 August 3, 2018 and August 9, 2018, impacted soils were excavated. Soil grab samples were collected from each wall of the separator excavation. All soil samples were submitted to Origins Laboratory in Denver, Colorado, for analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX), total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by USEPA Method 8260C, TPH - diesel range organics and residual range organics (DRO and RRO, respectively) by USEPA Method 8015, electrical conductivity (EC), and ph. Laboratory analytical results indicate that BTEX, TPH, EC, and pH levels were in full compliance with COGCC Table 910-1 allowable concentrations.

Proposed Groundwater Sampling

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

On August 6, 2018, grab groundwater sample GW01 was collected from the excavation and submitted to Origins Laboratory in Denver, Colorado, for analysis of BTEX by USEPA 8260. The laboratory results indicated that the benzene concentration was 2,010 ug/L. On August 7, 2018 grab groundwater sample GW02 was collected from the excavation and also submitted to Origins Laboratory in Denver, CO for analysis of BTEX by USEPA 8260. The groundwater results indicated that the benzene concentration was 5.52 ug/L.

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 9
Number of soil samples exceeding 910-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1305

NA / ND

-- Highest concentration of TPH (mg/kg) 4678
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 15

Groundwater

Number of groundwater samples collected 33
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 12'
Number of groundwater monitoring wells installed 11
Number of groundwater samples exceeding 910-1 9

-- Highest concentration of Benzene (µg/l) 3410
-- Highest concentration of Toluene (µg/l) 1.85
-- Highest concentration of Ethylbenzene (µg/l) 747
-- Highest concentration of Xylene (µg/l) 3020
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?

In November of 2018 and March of 2019, eight groundwater monitoring wells (MW01 - MW08) were installed. In October of 2019, three additional groundwater monitoring wells (MW09 - MW11) were installed in order to establish a downgradient point of compliance. Groundwater samples were submitted for laboratory analysis of BTEX by USEPA Method 8260. Groundwater elevation contour maps from the August 30, 2019 and November 1, 2019 sampling events are provided as Figures 1 and 2. Groundwater sample analytical results are summarized in Table 1, and the laboratory reports are provided in Attachment A. Soil boring log and well construction data for MW09 - MW11 are provided as Attachment B.

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.

A total of approximately 580 cubic yards (cy) of impacted soil were excavated and disposed. Approximately 460 cy were disposed at the Front Range Landfill in Erie, Colorado and 120 cy were disposed at the Kerr-McGee Land Treatment Facility in Weld County, Colorado. Minimal groundwater was encountered in the excavation and, therefore, not removed.

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.

While backfilling the excavation, 200 pounds of Chemically Oxygenated Granular Activated Carbon (COGAC) were applied to the groundwater.

Soil Remediation Summary

In Situ

Ex Situ

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

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 580
Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)
Yes _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
Yes _____ Other Chemically Oxygenated
Granular Activated Carbon
(COGAC) _____

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 will be conducted on a quarterly basis and all samples will be submitted for laboratory analysis of BTEX by USEPA Method 8260 until concentrations remain in full compliance with State standards for four consecutive quarters.

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 580

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Front Range Landfill, Erie, CO and
Kerr-McGee Land Treatment Facility
in Weld County, CO

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? 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 remains at this site.

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. 08/07/2018

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/03/2018

Date of commencement of Site Investigation. 08/03/2018

Date of completion of Site Investigation. 11/01/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. 08/03/2018

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 Environmental Rep.

Submit Date: _____

Email: Phillip_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: _____

Date: _____

Remediation Project Number: 12024

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.

<u>Att Doc Num</u>	<u>Name</u>
402237353	GROUND WATER ELEVATION MAP
402237354	GROUND WATER ELEVATION MAP
402237355	ANALYTICAL RESULTS
402237358	ANALYTICAL RESULTS
402237359	LOGS

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)