

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 INFORMATON

Name of Operator: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers Phone: <u>(970) 336-3500</u> Mobile: <u>()</u>
Address: <u>P O BOX 173779</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>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 3211 Initial Form 27 Document #: 1170169

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>Surface Water Sampling Reduction Request</u>

SITE INFORMATION N Multiple Facilites (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>319232</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DAVID HOWARD UNIT C-61N67W 32SWNW</u>	Latitude: <u>40.010230</u>	Longitude: <u>-104.919560</u>	
** correct Lat/Long if needed: Latitude: <u>40.009475</u>		Longitude: <u>-104.919396</u>	
QtrQtr: <u>SWNW</u>	Sec: <u>32</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 Surface Water and Agriculture

Is domestic water well within 1/4 mile? No 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

Surface water (irrigation ditch) is located approximately 40 feet (ft) southeast, and groundwater is present approximately 3 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 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 Results
Yes	SOILS	85' NE-SW x 40' NW-SE x 6' bgs	Soil Samples/Lab 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.

On December 12, 2003, a load line valve froze and split, resulting in the release of approximately 1 barrel (bbl) of oil and 29 bbls of produced water within the Howard David C #2 tank battery containment berm. 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):

On December 16, 2003, four soil samples were collected from the excavation for laboratory analysis of total petroleum hydrocarbon impacts (TPH). Laboratory analytical results indicated the soil samples were in full compliance with the Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable level for TPH. Additional details of the December 2003 excavation activities are summarized in the Form 27 submitted to the COGCC on July 21, 2004.

In February 2015, following tank battery decommissioning, additional source removal (saturated zone) was completed via excavation to assist the groundwater remediation. Impacted soil was not encountered in the vadose zone; therefore, soil samples were not submitted for laboratory analysis.

Proposed Groundwater Sampling

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

Groundwater was encountered in the excavation at approximately 3 ft bgs. On April 8, 2015, groundwater sample GW01 was collected from the excavation and submitted for laboratory analysis of BTEX analysis. Laboratory analytical results indicated sample GW01 exceeded the COGCC Table 910-1 allowable levels for benzene at a concentration of 120 micrograms per liter. The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 1.

Quarterly groundwater monitoring has been conducted at the site since April 2004.

Proposed Surface Water Sampling

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

Quarterly surface water monitoring has been conducted at the site since June 2004.

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 4
Number of soil samples exceeding 910-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 3400

NA / ND

-- Highest concentration of TPH (mg/kg) 434
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 0

Groundwater

Number of groundwater samples collected 814
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 3'
Number of groundwater monitoring wells installed 27
Number of groundwater samples exceeding 910-1 210

-- Highest concentration of Benzene (µg/l) 3420
-- Highest concentration of Toluene (µg/l) 6850
-- Highest concentration of Ethylbenzene (µg/l) 410
-- Highest concentration of Xylene (µg/l) 6900
NA Highest concentration of Methane (mg/l)

Surface Water

32 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?

Petroleum hydrocarbon impacts to groundwater were encountered in the field northwest of the former 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?

Groundwater monitoring well MW12 will be replaced to maintain historical point of compliance.

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.

In December 2003, approximately 146 cubic yards of petroleum hydrocarbon impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the groundwater table due to past seasonal fluctuations.

In February 2015, following tank battery decommissioning, additional source removal (saturated zone) was completed via excavation to assist the groundwater remediation. Approximately 750 cubic yards of petroleum hydrocarbon impacted soil was transported to Front Range Landfill in Erie, Colorado, for disposal. Approximately 300 cubic yards of petroleum hydrocarbon impacted groundwater were removed from the excavation and transported to the Kerr-McGee 16-24I injection facility, for disposal. The general site layout and 2003 and 2015 excavation footprints are depicted on the Site Map provided as Figure 1.

REMIEDIATION 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 2015 excavation, 300 pounds of COGAC™, a carbon-based bioremediation product designed to capture and degrade petroleum hydrocarbons via chemical oxidation and passive bio-stimulation, was applied to the groundwater and clean backfill through a series of lifts to insure distribution through the phreatic and smear zones.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 896

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007

_____ Natural Attenuation

No _____ Excavate and onsite remediation

_____ Other _____

_____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)

Yes _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____
Groundwater Removal and
COGAC™ 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, MW02R, MW03R, MW05R, MW07R, MW08R3, MW09, MW10, MW11, MW13, MW14, MW15, MW19, and MW20 and surface water sample location D-01 are sampled on a quarterly basis and submitted for laboratory analysis for benzene, toluene, ethylbenzene, and total xylenes. The monitoring well and surface water sample locations are depicted on Figure 1. A Groundwater Elevation Contour Map generated using the December 2019 survey data is provided as Figure 2. The groundwater and surface water analytical results are summarized in Table 1 and Table 2, respectively. The laboratory analytical reports for the March 2019, June 2019, September 2019, and December 2019 groundwater monitoring events are attached.

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

Based on the groundwater analytical data to date, Kerr-McGee requests the removal of surface water sample location D-01 from the quarterly monitoring program. Surface water sample location D-01 has been in full compliance with COGCC Table 910-1 allowable levels for BTEX since sampling began in June 2004 and is no longer needed for point of compliance.

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 146 cubic yards of petroleum hydrocarbon impacted soil was removed from the 2003 excavation and transported to the Kerr-McGee Land Treatment Facility, in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 896

E&P waste (solid) description Petroleum hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: Front Range Landfill in Erie, Colorado
(750 cubic yards from the 2015
excavation)

Volume of E&P Waste (liquid) in barrels 300

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? Yes

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 tank battery was reconstructed following completion of the 2003 excavation activities. In 2015, the Kerr-McGee facility was deconstructed, and the site was restored to its pre-release grade. 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. _____

Actual Spill or Release date, if known. 12/15/2003

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/16/2003

Date of commencement of Site Investigation. 12/16/2003

Date of completion of Site Investigation. 03/03/2017

REMEDIAL ACTION DATES

Date of commencement of Remediation. 12/16/2003

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 Environmental Rep.

Submit Date: 01/03/2020

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: CHRIS CANFIELD

Date: 01/03/2020

Remediation Project Number: 3211

COA Type

Description

<u>COA Type</u>	<u>Description</u>

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>
402271636	FORM 27-SUPPLEMENTAL-SUBMITTED
402271809	GROUND WATER ELEVATION MAP
402271814	SITE MAP
402272109	ANALYTICAL RESULTS

Total Attach: 4 Files

General Comments

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

Total: 0 comment(s)