

# 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:

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: KERR MCGEE OIL & GAS ONSHORE LP	Operator No: 47120	<b>Phone Numbers</b> Phone: (970) 336-3500 Mobile: (970) 515-1161
Address: P O BOX 173779		
City: DENVER	State: CO Zip: 80217-3779	
Contact Person: Phillip Hamlin	Email: Phil_Hamlin@oxy.com	

### 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 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 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

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

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

#### 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 livestock holding pen is located approximately 1,020 feet southeast of the release location. A building is located approximately 1,220 feet east-northeast 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 27, 2014, historical impacts were discovered during tank battery decommissioning 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. Soil sample analytical data is presented in Table 1, and the soil sample locations are illustrated on Figure 1.

#### Proposed Groundwater Sampling

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

Groundwater sample GW01 was collected from the excavation and submitted for BTEX analysis. Analytical results indicated that the benzene concentration exceeded the COGCC Table 910-1 standards. Quarterly groundwater monitoring was initiated on April 14, 2015, and was continued through January 23, 2018. Temporary monitoring wells BH01 - BH07 were subsequently destroyed during construction of a new production facility. Replacement well BH02R and new wells BH08 - BH11 were installed upon completion of facility construction activities. Quarterly groundwater sampling was reinitiated on March 28, 2019, and was continued until concentrations remained in full compliance with COGCC standards for 4 consecutive quarters. Groundwater analytical data is presented in Table 2. The excavation groundwater sample location is illustrated on Figure 1; monitoring well locations are illustrated on Figures 2 - 5. Laboratory reports for the previous 4 quarters of GW monitoring are provided 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 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 101

Was extent of groundwater contaminated delineated? Yes

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

Number of groundwater monitoring wells installed 12

Number of groundwater samples exceeding 910-1 11

-- 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?

# 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. Laboratory analytical results indicated that constituent concentrations in the soil samples collected from the final lateral extent of the excavation area were in full compliance with COGCC standards. Soils were excavated into the phreatic zone to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. The final excavation extent and associated sample locations are illustrated on Figure 1. Approximately 80 barrels of impacted groundwater were removed from the excavation area 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.

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. 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.

## 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, 2015 and October 12, 2015, 7 temporary groundwater monitoring wells (BH01 - BH07) were installed at the site to further assess the extent of remaining groundwater impacts. All 7 groundwater monitoring wells were destroyed following the First Quarter 2018 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, and one replacement temporary monitoring well (BH02R) and four new temporary monitoring wells (BH08 - BH11) were subsequently installed on March 12, 2019. Replacement monitoring wells could not be installed in the original locations of wells BH01 and BH03 - BH07, due to the configuration of the new production facility infrastructure and the layout of the underground lines. The temporary groundwater monitoring wells were sampled on a quarterly basis and submitted for laboratory analysis of BTEX. Analytical results for the groundwater samples collected from the temporary monitoring wells indicate that constituent concentrations were in full compliance with COGCC standards for four consecutive quarters. Temporary groundwater monitoring well locations and quarterly groundwater elevation contour maps are illustrated on Figures 2 through 5. Well completion logs for the temporary monitoring wells are provided as Attachment B.

## 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

### 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

## 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? 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? 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 has been restored to its pre-release grade. A new Kerr-McGee production facility has been constructed at this location and remains on-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. 10/27/2014

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. 03/12/2019

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 10/27/2014

Date of completion of Remediation. 12/12/2019

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

Laboratory analytical data for the soil samples collected from the final lateral extent of the excavation area were in full compliance with COGCC standards. Laboratory analytical data for the groundwater samples collected from the temporary monitoring wells indicated that constituent concentrations were in full compliance with COGCC standards for four consecutive quarters. Soil analytical results are summarized in Table 1, and groundwater analytical results are summarized in Table 2. Excavation soil and groundwater sample locations are illustrated on Figure 1; temporary monitoring well locations and quarterly groundwater contour maps are illustrated on Figures 2 through 5. Laboratory analytical reports and temporary monitoring well completion diagrams are provided as Attachments A and B, respectively. Based on the remediation activities completed at the site and the analytical results presented herein, Kerr-McGee is requesting an NFA determination for this release.

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

Signed: ` Phillip Hamlin \_\_\_\_\_

Title: Senior Environmental Rep \_\_\_\_\_

Submit Date: ` 01/20/2020 \_\_\_\_\_

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: 01/21/2020 \_\_\_\_\_

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**

402276114	FORM 27-SUPPLEMENTAL-SUBMITTED
402276179	GROUND WATER ELEVATION MAP
402276180	LOGS
402276181	ANALYTICAL RESULTS
402277352	SOIL SAMPLE LOCATION MAP
402277353	ANALYTICAL RESULTS
402277354	ANALYTICAL RESULTS

Total Attach: 7 Files

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

Environmental	<p>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 groundwater is found to be impacted, then further investigation and/or 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.</p> <p>For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>	01/20/2020
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Total: 1 comment(s)