

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:  
402302334  
Receive Date:  
02/21/2020  
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 &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b>
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>( )</u>

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**  
Remediation Project #: 5719 Initial Form 27 Document #: 2213742

**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>LOCATION</u>	Facility ID: <u>328116</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-DUBACH-63N66W 4SESE</u>	Latitude: <u>40.248560</u>	Longitude: <u>-104.775320</u>	
	** correct Lat/Long if needed: Latitude: <u>40.252029</u>	Longitude: <u>-104.773728</u>	
QtrQtr: <u>SESE</u>	Sec: <u>4</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 SM Most Sensitive Adjacent Land Use Irrigation Canal

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**

Water well approximately 55 feet (ft) west, surface water (irrigation canal) approximately 40 ft north, occupied building approximately 410 ft northeast, and groundwater approximately 6 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 Analysis
Yes	SOILS	32' N-S X 30' E-W X 8' bgs	Soil Samples/Lab 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.

In February 2011, field crews discovered soil with historical petroleum hydrocarbon impacts while rebuilding the Dubach 16-4, Thesing 9-4 tank battery. 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 February 10 and 11, 2011, six soil samples were collected from the excavation sidewalls and submitted for laboratory analysis of total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Laboratory analytical results indicated that TPH and BTEX concentrations were in full compliance with COGCC Table 910-1 allowable levels at the lateral extent of the excavation.

### Proposed Groundwater Sampling

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

On September 2, 2010, one groundwater sample (GW01) was collected from the base of the excavation for laboratory analysis of BTEX. Laboratory analytical results for groundwater sample GW01 indicated that the BTEX concentrations exceeded the COGCC Table 910-1 allowable levels at 4,800 micrograms per liter (µg/L), 2,100 µg/L, 850 µg/L, and 7,700 µg/L, respectively. The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 1.

Groundwater monitoring has been conducted on a quarterly basis since March 2011.

### Proposed Surface Water Sampling

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

Surface water sampling of the irrigation canal has been conducted on a quarterly basis since March 2012.

## 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 6  
Number of soil samples exceeding 910-1 2  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 960

### NA / ND

-- Highest concentration of TPH (mg/kg) 6600  
NA Highest concentration of SAR           
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 6

### Groundwater

Number of groundwater samples collected 382  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 6'  
Number of groundwater monitoring wells installed 16  
Number of groundwater samples exceeding 910-1 113

-- Highest concentration of Benzene (µg/l) 7900  
-- Highest concentration of Toluene (µg/l) 2100  
-- Highest concentration of Ethylbenzene (µg/l) 1100  
-- Highest concentration of Xylene (µg/l) 12000  
NA Highest concentration of Methane (mg/l)         

### Surface Water

66 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?

Groundwater impacts were detected in the adjoining rangeland north of the 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?

# 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.

Approximately 285 cubic yards of impacted soil were excavated and transported to Buffalo Ridge Landfill in Keenesburg, Colorado, for disposal. The impacted soil was excavated into the capillary and phreatic zones to address potential petroleum hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. The general site layout and excavation footprint are depicted on the Site Map provided as Figure 1.

## 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.

Please refer to the Remediation Summary Attachment.

## 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) \_\_\_\_\_ 285  
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

Yes \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
Yes \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Air sparge / Soil vapor extraction  
Yes \_\_\_\_\_ Natural Attenuation  
Yes \_\_\_\_\_ Other MicroBlaze® Application (2011);  
TPH-ENHANCED® Application  
and BOS 200® Injection (2019)

## 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 through MW13 are sampled on a quarterly basis and submitted for laboratory analysis of BTEX. The monitoring well locations are depicted on Figure 1. The 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 monitoring events are attached.

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

# 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 285

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

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Buffalo Ridge Landfill in 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? 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 was reconstructed.

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. 02/08/2011

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/10/2011

Date of commencement of Site Investigation. 02/10/2011

Date of completion of Site Investigation. 06/27/2017

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/10/2011

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: 02/21/2020

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: PETER GINTAUTAS

Date: 02/24/2020

Remediation Project Number: 5719

### 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.
--	---

### 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>
402302334	FORM 27-SUPPLEMENTAL-SUBMITTED
402302396	ANALYTICAL RESULTS
402306028	SITE MAP
402306029	GROUND WATER ELEVATION MAP
402319252	REMEDATION PROGRESS REPORT

Total Attach: 5 Files

### General Comments

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

Total: 0 comment(s)