

# 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	<b>Phone Numbers</b>
Address: P O BOX 173779		Phone: (970) 336-3500
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Phil Hamlin	Email: Phil_Hamlin@oxy.com	Mobile: ( )

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 11947

Initial Form 27 Document #: 401663423

#### 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: SPILL OR RELEASE	Facility ID: 454689	API #:	County Name: WELD
Facility Name: PC Gas Unit 1-26	Latitude: 40.106095	Longitude: -104.974768	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NESW	Sec: 26	Twp: 2N	Range: 68W
Meridian: 6	Sensitive Area?	Yes	

#### SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Agriculture

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

An occupied building is located approximately 1,120 feet (ft) northwest, and excavation groundwater approximately 4 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 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 Samples/Lab Analysis
Yes	SOILS	30' N-S x 12' E-W x 4' bgs (max)	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.

While excavating a flowline at the PC Gas Unit #1-26 facility, historical petroleum hydrocarbon impacts were encountered. The volume of the release is unknown. 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 March 26, 2018, four soil samples were collected from the excavation sidewalls for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), pH, and specific conductivity (EC). Laboratory analytical results indicated that TPH, BTEX, pH, and EC concentrations and levels were in full compliance with Colorado Oil and Gas Conservation Commission (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 March 26, 2018, groundwater sample GW01 was collected from the excavation and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated sample GW01 exceeded the COGCC Table 910-1 allowable level for benzene at a concentration of 42.4 micrograms per liter (µg/L). The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 1.

### 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 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) 360

### NA / ND

-- Highest concentration of TPH (mg/kg) 10.4  
NA Highest concentration of SAR           
BTEX > 910-1           
Vertical Extent > 910-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 61  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 4'  
Number of groundwater monitoring wells installed 10  
Number of groundwater samples exceeding 910-1 37

-- Highest concentration of Benzene (µg/l) 3780  
ND Highest concentration of Toluene (µg/l)           
-- Highest concentration of Ethylbenzene (µg/l) 1720  
-- Highest concentration of Xylene (µg/l) 14700  
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?

A background soil sample was submitted to the laboratory and placed on hold for analysis. Laboratory analytical results for the excavated soil samples indicated that pH and EC levels were compliant at the extent of the excavation; therefore, the background soil sample was not run for laboratory analysis.

☐ 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?

The extent of groundwater contamination has not yet been delineated. Additional monitoring wells will be installed to establish points 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.

Approximately 40 cubic yards of impacted soil were excavated and transported to Front Range Landfill in Erie, Colorado, for disposal. The impacted soil was excavated into the capillary and phreatic zones to address potential 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.

While backfilling the excavation, 50 pounds of COGAC®, a carbon-based bioremediation product designed to capture and degrade petroleum hydrocarbons via chemical oxidation and passive bio-stimulation, were applied to the clean backfill in a series of lifts in the capillary and phreatic horizons.

## 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) \_\_\_\_\_ 40

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 \_\_\_\_\_ 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 through MW10 are sampled on a quarterly basis and submitted for laboratory analysis for BTEX by United States Environmental Protection Agency Method 8260D. The monitoring well locations are depicted on Figure 1. A Groundwater Elevation Contour Map generated using the January 2020 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical report for the January 2020 groundwater monitoring event is attached.

Additional monitoring wells will be installed to establish points of compliance. Groundwater 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 \_\_\_\_\_ 40

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

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

Non-COGCC Disposal Facility: \_\_\_\_\_ Front Range Landfill in Erie, 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 flowline was replaced and cathodic protection was installed. The site was restored to its pre-release grade.

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. 03/28/2018

Actual Spill or Release date, if known. 03/27/2018

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 03/26/2018

Date of commencement of Site Investigation. 03/26/2018

Date of completion of Site Investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 03/26/2018

Date of completion of Remediation. \_\_\_\_\_

### **SITE RECLAMATION DATES**

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

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

### **OPERATOR COMMENT**

Form 27 update reports will be submitted to the COGCC on a quarterly basis until the extent of groundwater impacts has been fully delineated.

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: 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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 11947

### **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**

402333081	SITE MAP
402333082	GROUND WATER ELEVATION MAP
402349266	ANALYTICAL RESULTS

Total Attach: 3 Files

### **General Comments**

### **User Group**

### **Comment**

### **Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)