

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

402384067

Receive Date:

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

Report taken by:

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: Phil_Hamlin@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9787 Initial Form 27 Document #: 200440043

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: 445591	API #:	County Name: WELD
Facility Name: SPILL/RELEASE POINT		Latitude: 40.141908	Longitude: -104.672677
		** correct Lat/Long if needed: Latitude:	Longitude:
QtrQtr: SENW	Sec: 16	Twp: 2N	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Rangeland
 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? No

Other Potential Receptors within 1/4 mile

Domestic water well approximately 1,050 feet (ft) northwest, building approximately 1,350 ft west, livestock approximately 4,000 ft southeast, and groundwater approximately 45 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 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	54' N-S x 27' E-W x 45' 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 April 2016, two partially-buried produced water sumps were removed during tank battery deconstruction activities at the Four Way-62N65W/16SE9W facility. Soil with historical petroleum hydrocarbon impacts were encountered beneath the southern produced water sump. The petroleum hydrocarbon impacted soil was excavated to a depth of approximately 25 ft bgs. Based on August 2016 assessment activities, impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs.

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 April 14 and 21, 2016, twelve soil samples were collected from the excavation for benzene, toluene, ethylbenzene, and total xylenes (BTEX), total petroleum hydrocarbons (TPH), pH, and specific conductance (EC). Laboratory analytical results indicated that benzene, total xylenes, TPH, and pH exceeded the Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the base of the excavation. In August 2016, a subsurface assessment was conducted to determine the extent of impacted soil in place. The assessment activities indicated that impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs. Please refer to the Form 27 Update Report submitted to the COGCC on October 28, 2016, for further details. The general site layout, excavation extent, and extent of impacted soil in place are depicted on the Site Map provided as Figure 1.

Proposed Groundwater Sampling

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

Groundwater monitoring has been conducted on a quarterly basis since August 2016.

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 48
Number of soil samples exceeding 910-1 15
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 1458

NA / ND

-- Highest concentration of TPH (mg/kg) 16560
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 45

Groundwater

Number of groundwater samples collected 90
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 45
Number of groundwater monitoring wells installed 6
Number of groundwater samples exceeding 910-1 21

-- Highest concentration of Benzene (µg/l) 1410
-- Highest concentration of Toluene (µg/l) 7200
-- Highest concentration of Ethylbenzene (µg/l) 2460
-- Highest concentration of Xylene (µg/l) 33500
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?

Petroleum hydrocarbon impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs. Prior to submittal of a No Further Action (NFA) status request, the impacted soil left in place will be reassessed for compliance with COGCC Table 910-1 allowable levels.

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.

The petroleum hydrocarbon impacted soil was excavated to a depth of approximately 25 ft bgs. Approximately 780 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to Buffalo Ridge Landfill in Keenesburg, Colorado, for disposal. Petroleum hydrocarbon impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs. Please refer to the Form 27 Update Report submitted to the COGCC on October 28, 2016, for further details regarding the excavation and subsurface assessment activities. The excavation footprint and extent of the petroleum hydrocarbon impacted soil left in place 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 Form 27 Update Report submitted to the COGCC on October 28, 2016, for initial remediation activities. Prior to submittal of an NFA status request, the impacted soil left in place beneath the backfilled excavation will be reassessed for compliance with COGCC Table 910-1 allowable levels.

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) _____ 780
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
No _____ Other _____

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 MW06 are sampled on a quarterly basis and submitted for laboratory analysis of BTEX. The monitoring well and surface water locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the April 2020 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1. The laboratory analytical reports for the April 2019, July 2019, October 2019, January 2020, and April 2020 monitoring events are attached.

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 780

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? No

Does the previous reply indicate consideration of background concentrations? _____

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? No

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 Kerr-McGee tank battery facility was deconstructed. 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. 04/21/2016

Actual Spill or Release date, if known. 04/20/2016

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/14/2016

Date of commencement of Site Investigation. 04/20/2016

Date of completion of Site Investigation. 08/09/2016

REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/20/2016

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: 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: 9787

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>
402384079	GROUND WATER ELEVATION MAP
402384080	SITE MAP
402384272	ANALYTICAL RESULTS

Total Attach: 3 Files

General Comments

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

Total: 0 comment(s)