

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:

402407049

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	Phone Numbers
Address: P O BOX 173779		Phone: (970) 336-3500
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Phillip Hamlin	Email: Phillip_Hamlin@oxy.com	Mobile: (970) 515-1161

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10875 Initial Form 27 Document #: 401466350

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 Replacement monitoring well notification, monitoring well reduction request |

SITE INFORMATION

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

Facility Type: SPILL OR RELEASE	Facility ID: 453126	API #:	County Name: WELD
Facility Name: SPILL/RELEASE POINT		Latitude: 40.071457	Longitude: -104.983087
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENE	Sec: 10	Twp: 1N	Range: 68W 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? 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

A building is located approximately 795 feet north-northwest of the release location.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- ☒ E&P Waste ☐ Other E&P Waste ☐ Non-E&P Waste
- ☒ Produced Water ☐ Workover Fluids
- ☒ Oil ☐ Tank Bottoms
- ☒ Condensate ☐ Pigging Waste
- ☐ Drilling Fluids ☐ Rig Wash
- ☐ Drill Cuttings ☐ Spent Filters
- ☐ Pit Bottoms
- ☐ 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	98' (E-W) x 84' (N-S) x 14' 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 September 20, 2017, historical impacts were discovered during third-party maintenance operations at the CPC 41-10 #1, Champlin 31-10 #3, 32-10 #2, 42-10 #4 production facility. The facility was shut-in, affected infrastructure removed, and excavation activities were initiated. On November 6, 2017, groundwater was observed seeping into the excavation at approximately 13 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 453126 for this release. On June 13, 2019, during abandonment of the adjacent production facility, additional excavation activities were conducted to the south of the 2017 excavation area.

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 during the 2017 excavation activities, as described in the Form 27-Initial (COGCC Document No. 401466350), and during the 2019 excavation activities, as described in a Form 27-Supplemental Update (COGCC Document No. 402202729). Based on the data presented, impacted soils in the 2017 and 2019 excavation areas were remediated to be in full compliance with the COGCC Table 910-1 standards, except for the SAR values in samples B15@14' and B16@14', which were collected below the designated root zone.

Proposed Groundwater Sampling

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

Between May 1, 2018 and March 1, 2019, nineteen (19) temporary monitoring wells (BH01 - BH19) were installed to further assess the extent of groundwater impacts. Quarterly groundwater monitoring was initiated on June 29, 2018, and is ongoing at the ten (10) monitoring wells remaining at the site. Wells BH01 - BH06, BH08, BH14, and BH18 were destroyed during abandonment and reclamation activities at an adjacent production facility. The remaining monitoring wells are scheduled to be abandoned in June 2020 per landowner request. Pending completion of agricultural activities, select monitoring wells will be replaced, as described in the Groundwater Monitoring section. Groundwater samples are collected from the temporary monitoring wells on a quarterly basis and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX).

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):

Groundwater analytical data is presented in Table 1, and the groundwater sample locations are illustrated on Figure 1. The laboratory analytical reports for the Fourth Quarter 2019, First Quarter 2020, and Second Quarter 2020 groundwater monitoring events are provided as Attachment A.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 56

Number of soil samples exceeding 910-1 19

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 4590

NA / ND

-- Highest concentration of TPH (mg/kg) 1825

-- Highest concentration of SAR 16.65

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 14

Groundwater

Number of groundwater samples collected 121

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 6'

Number of groundwater monitoring wells installed 19

Number of groundwater samples exceeding 910-1 35

-- Highest concentration of Benzene (µg/l) 176

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 48.7

-- Highest concentration of Xylene (µg/l) 27.8

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?

Soil impacted above COGCC standards extended laterally beyond the lease boundary. This soil was removed during excavation activities, as previously described. Impacted groundwater has been detected in off-site temporary groundwater monitoring wells BH02, BH04, BH05, BH06, BH09, BH10, and BH11.

☐ 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?

The temporary groundwater monitoring wells will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with the COGCC Table 910-1 standards for four consecutive quarters. Wells BH01 - BH06, BH08, BH14, and BH18 were destroyed during abandonment and reclamation activities at an adjacent production facility. The remaining monitoring wells will be abandoned per landowner request. Select replacement temporary groundwater monitoring wells will be installed, as described in the Groundwater Monitoring section.

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 September 20 and November 9, 2017, approximately 1,390 cubic yards of impacted material were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal. On June 13, 2019, approximately 370 cubic yards of impacted material were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal.

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.

Laboratory data indicate that impacted soils in the 2017 and 2019 excavation areas have been remediated to be in full compliance with the COGCC Table 910-1 standards, except for the SAR values in samples B15@14' and B16@14', which were collected below the designated root zone. Quarterly groundwater monitoring is ongoing and will be continued until concentrations remain in full compliance with the COGCC Table 910-1 standards for four consecutive quarters. Additional remedial activities may be evaluated, as necessary, to address potential remaining groundwater impacts. Estimated time to attain NFA is TBD based on the groundwater concentrations, the extent of impacted groundwater, and the efficacy of the selected remedial technologies.

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) 1760
_____ 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.

Between May 1, 2018 and March 1, 2019, 19 temporary groundwater monitoring wells (BH01 - BH19) were installed to assess the extent of groundwater impacts. Wells BH01 - BH06, BH08, BH14, and BH18 were destroyed during abandonment and reclamation activities at an adjacent production facility. The remaining monitoring wells are scheduled to be abandoned per landowner request. Select monitoring well locations (BH01 - BH11, BH13, BH15 - BH17, and BH19) will be replaced. Based on historical groundwater analytical results, Kerr-McGee is requesting the removal of temporary monitoring wells BH12, BH14, and BH18 from the groundwater monitoring program. The sixteen (16) proposed replacement temporary groundwater monitoring wells will be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with the COGCC Table 910-1 standards for four consecutive quarters. Destroyed monitoring wells and the groundwater sample locations are illustrated on Figure 1, a potentiometric surface contour map for the Second Quarter 2020 is presented as Figure 2, and the proposed replacement monitoring well locations are illustrated on Figure 3. Well completion logs for the temporary monitoring wells are provided as Attachment B.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Replacement monitoring well notification, monitoring well reduction request

Report Type: ☒ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report
☒ Other Replacement monitoring well notification, monitoring well reduction 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 1760

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Front Range Landfill - 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? 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? Yes

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 site has been restored to its pre-release grade. Kerr-McGee will conduct reclamation activities in accordance with COGCC 1000 Series 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. 09/22/2017

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/20/2017

Date of commencement of Site Investigation. 09/20/2017

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 09/20/2017

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Based on historical groundwater analytical results, Kerr-McGee is requesting the removal of temporary monitoring wells BH12, BH14, and BH18 from the groundwater monitoring program. Upon COGCC approval, replacement monitoring wells will be installed for the 16 remaining locations (BH01 - BH11, BH13, BH15 - BH17, BH19) that have been destroyed or are scheduled to be abandoned. The replacement monitoring wells will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with the COGCC Table 910-1 standards for four consecutive quarters.

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: _____

Email: Phillip_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: 10875

COA Type

Description

--	--

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

402407215	LOGS
402407216	GROUND WATER SAMPLE LOCATION
402407218	GROUND WATER ELEVATION MAP
402407224	ANALYTICAL RESULTS
402409875	ANALYTICAL RESULTS
402410527	SITE MAP

Total Attach: 6 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)