

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

BOB CHESSON

## 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 GATHERING LLC</u>	Operator No: <u>47121</u>	<b>Phone Numbers</b>
Address: <u>PO BOX 173779</u>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217</u>		Mobile: <u>(970) 515-1604</u>
Contact Person: <u>Chad Gililland</u>	Email: <u>Chad.Gililland@westernmidstream.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9471 Initial Form 27 Document #: 200438861

#### 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: <u>SPILL OR RELEASE</u>	Facility ID: <u>443445</u>	API #: _____	County Name: <u>ARAPAHOE</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>39.709735</u>	Longitude: <u>-104.396589</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>11</u>	Twp: <u>4S</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Non-Crop Land

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? No

#### Other Potential Receptors within 1/4 mile

A building is located approximately 1,175 feet southwest 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	SOILS	41' (N-S) x 30' (E-W) x 23' bgs	Excavation, soil boring, 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 23, 2015, a release due to internal corrosion was discovered at the Pipeline 38-0000-5854-4" location. The pipeline was isolated and blown-down, and excavation activities were initiated. Groundwater was not encountered in the excavation area or during subsequent soil boring activities. The COGCC issued Spill/Release Point ID 443445 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 from the base and sidewalls of the excavation area, as described in the Initial Form 27 (Document No. 200438861). Analytical results indicated that soil impacts remained at the base of the excavation approximately 20 feet below ground surface (bgs), adjacent to sample B02@20'. Between November 30, 2015 and June 25, 2020, additional soil samples were collected from and from ten (10) soil borings (BH01 - BH05, BH07 - BH10, and BH12), to determine the nature and extent of the remaining soil impacts. Soil borings BH06 and BH11 encountered shallow refusal and no samples were collected. Laboratory analytical results indicate that hydrocarbon impacts to soil remain between approximately 17 and 20.5 feet bgs, and are limited to an areal extent of approximately 12 feet by 12 feet in the northern portion of the former excavation area.

### Proposed Groundwater Sampling

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

Groundwater was not encountered during excavation or soil boring activities.

### 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 ):

Soil analytical results are summarized in Table 1. The excavation soil sample locations are illustrated on Figure 1. The soil boring sample locations and estimated extent of remaining soil impacts are illustrated on Figure 2. The laboratory analytical report for the June 2020 soil boring sampling activities is provided as Attachment A, and the soil boring logs are provided as Attachment B.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 24

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 990

### NA / ND

-- Highest concentration of TPH (mg/kg) 2280

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 20

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 390'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

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 September 23 and 25, 2015, approximately 140 cubic yards of impacted material was excavated and transported to the Tower Landfill in Commerce City, 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 analytical results indicate that impacted soils remain in the northern portion of the former excavation area between approximately 17 and 20.5 feet bgs, and are limited to an areal extent of approximately 12 feet by 12 feet. The excavation area was backfilled due to safety concerns in 2015, and further excavation and remediation activities were not conducted. Based on the results of the June 2020 soil boring and sampling activities, the remaining hydrocarbon impacts in soil have been reduced through natural attenuation. In 2015, the contaminant concentrations in soil sample B02@20' were benzene (0.366 milligrams per kilogram [mg/kg]) and TPH (2,280 mg/kg). In June 2020, the remaining contaminant concentration in soil sample BH07@17-17.5' was TPH (529 mg/kg). Although the TPH concentration remained above the applicable COGCC Table 910-1 standard, the observed reduction in constituent concentrations from 2015 to 2020 indicates that residual hydrocarbon impacts to soil are being remediated through natural attenuation. The remaining soil impacts are limited to a relatively small vertical and areal extent and do not pose a migration risk to the regional groundwater table. As such, and 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

No Bioremediation ( or enhanced bioremediation )

No Chemical oxidation

No Air sparge / Soil vapor extraction

Yes Natural Attenuation

No Other

☒ Ex Situ

Yes Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) 140

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

☐ Bioremediation ( or enhanced bioremediation )

☐ Chemical oxidation

☐ Air sparge / Soil vapor extraction

☐ Natural Attenuation

☐ 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 was not encountered during excavation or soil boring activities.

## REMEDATION 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 140

E&P waste (solid) description Hydrocarbon-impacted soil

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

Non-COGCC Disposal Facility: Tower Landfill - Commerce City,  
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: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

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? 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. 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. \_\_\_\_\_

Actual Spill or Release date, if known. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 09/23/2015

Date of commencement of Site Investigation. 09/23/2015

Date of completion of Site Investigation. 06/25/2020

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 09/23/2015

Date of completion of Remediation. 06/25/2020

### **SITE RECLAMATION DATES**

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

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

**OPERATOR COMMENT**

As described, laboratory analytical results for the soil samples collected from the final lateral and vertical extents of the excavation area were in full compliance with the COGCC Table 910-1 standards, except for the benzene and TPH concentrations in base sample B02@20'. Subsequent soil boring sampling activities were completed in June 2020. As described herein, laboratory analytical results indicate that the remaining hydrocarbon impacts to soil are limited to an area of approximately 12 feet by 12 feet, at a depth of approximately 17 to 20.5 feet bgs. Analytical results are summarized in Table 1; the excavation soil sample locations are illustrated on Figure 1; the soil boring sample locations and the estimated extent of remaining soil impacts are illustrated on Figure 2. The laboratory analytical report for the June 2020 soil boring sampling activities is provided as Attachment A, and the soil boring logs are provided as Attachment B. Based on the limited extent of remaining soil impacts and the absence of exposure pathways related to these impacts, remediation is complete at this site and 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: Chad Gililand

Title: Staff Environmental Rep

Submit Date: 09/22/2020

Email: Chad.Gililand@westernmidstream.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: BOB CHESSON

Date: 09/22/2020

Remediation Project Number: 9471

**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**

402489849	FORM 27-SUPPLEMENTAL-SUBMITTED
402490904	LOGS
402490911	ANALYTICAL RESULTS
402494961	SOIL SAMPLE LOCATION MAP
402494962	SOIL SAMPLE LOCATION MAP
402495036	ANALYTICAL RESULTS

Total Attach: 6 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.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. 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>	09/22/2020
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Total: 1 comment(s)