

State of Colorado  
Oil and Gas Conservation Commission

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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> Phone: <u>(970) 336-3500</u> Mobile: <u>( )</u>
Address: <u>P O BOX 173779</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>		

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**  
Remediation Project #: 4235 Initial Form 27 Document #: 1982488

**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>327225</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-FAUST-63N66W 21SWSW</u>	Latitude: <u>40.204970</u>	Longitude: <u>-104.789280</u>	
	** correct Lat/Long if needed: Latitude: <u>40.205604</u>	Longitude: <u>-104.786186</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>21</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 CL Most Sensitive Adjacent Land Use Surface Water and Agriculture

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**

Surface water approximately 50 feet (ft) east and groundwater approximately 3 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 Sampling/Laboratory Analysis
Yes	SOILS	75' N-S x 40' E-W x 8' bgs (max)	Soil Sampling/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.

In February 2008, petroleum hydrocarbon impacted soil was encountered while field crews were tying new wells into the HSR-Faust 13-21A, HSR-Poe 12-21A, HSR-Simons 14-21A tank battery. The release was caused by a hole in the side of the partially-buried produced water sump. 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 21 and 22, 2008, eight soil samples were collected from the excavation sidewalls and submitted for laboratory analysis of total petroleum hydrocarbons (TPH). Laboratory analytical results indicated that the TPH concentrations were in full compliance with the Colorado Oil and Gas Conservation Commission (COGCC) sensitive area allowable level of 1,000 milligrams per kilogram (mg/kg) at the lateral extent of the excavation. The soil samples were not analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) as the samples were collected prior to the April 1, 2009, COGCC rule changes. The excavation footprint is depicted on the Site Map provided as Figure 1. Please refer to the Form 27 submitted to the COGCC on May 14, 2008, for additional details.

### Proposed Groundwater Sampling

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

On February 21, 2008, one groundwater sample (GW01) was collected from the open excavation for laboratory analysis of BTEX. Laboratory analytical results for groundwater sample GW01 indicated that the benzene concentration exceeded the COGCC Table 910-1 allowable level at 600 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.

Groundwater monitoring has been performed on a quarterly basis since May 2008.

### Proposed Surface Water Sampling

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

On February 22, 2008, two surface water samples were collected from the irrigation ditch and submitted for laboratory analysis of BTEX. The laboratory analytical results indicated the surface water samples were less than the laboratory reporting limit of 1.0 µg/L for BTEX. Please refer to the Form 27 submitted to the COGCC on May 14, 2008, for additional details.

## 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 8  
Number of soil samples exceeding 910-1 0  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 2175

### NA / ND

-- Highest concentration of TPH (mg/kg) 870  
NA Highest concentration of SAR           
BTEX > 910-1 No  
Vertical Extent > 910-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 322  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 2'  
Number of groundwater monitoring wells installed 12  
Number of groundwater samples exceeding 910-1 59

-- Highest concentration of Benzene (µg/l) 1700  
-- Highest concentration of Toluene (µg/l) 220  
-- Highest concentration of Ethylbenzene (µg/l) 140  
-- Highest concentration of Xylene (µg/l) 410  
NA Highest concentration of Methane (mg/l)         

### Surface Water

2 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.

Approximately 415 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the groundwater table due to past seasonal fluctuations. The general site layout and excavation footprint are depicted on the Site Map attached 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.

Prior to backfilling, ten gallons of MicroBlaze®, a concentrated solution of facultative microbes, nutrients, and surfactants designed to bioremediate petroleum hydrocarbons, were applied to the groundwater and exposed smear zone soil in the open excavation. Additional remedial options are under evaluation.

## Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 415

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_ 149007

\_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Other \_\_\_\_\_

## Groundwater Remediation Summary

Yes \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

Yes \_\_\_\_\_ Natural Attenuation

Yes \_\_\_\_\_ Other \_\_\_\_\_ MicroBlaze® 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 MW04 and MW07 through MW12 are sampled on a quarterly basis. The monitoring well locations are depicted on Figure 1.

The groundwater samples were submitted for BTEX by United States Environmental Protection Agency Method 8260D though the November 2020 monitoring event. Per the January 15, 2021 rule changes, groundwater samples were submitted for the full list of analytes for groundwater in Table 915-1 as of the February 2021 monitoring event. Cross-gradient and historically compliant groundwater monitoring well MW09 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. The Groundwater Elevation Contour Map generated using the February 2021 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical reports for the May 2020, August 2020, November 2020, and February 2021 groundwater 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:

The petroleum hydrocarbon impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 415

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

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_ 149007

Non-COGCC Disposal Facility: \_\_\_\_\_

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 remains at the site.

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. 02/14/2008

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/21/2008

Date of commencement of Site Investigation. 02/21/2008

Date of completion of Site Investigation. 11/27/2018

## REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/21/2008

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: 02/26/2021

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: 02/26/2021

Remediation Project Number: 4235

## COA Type

## Description

	Submit reports of site investigation and progress of remediation including results of quarterly groundwater sampling and analysis on an annual basis or more often until the remediation project is closed.
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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

402606590	FORM 27-SUPPLEMENTAL-SUBMITTED
402607338	ANALYTICAL RESULTS
402609408	SITE MAP
402609409	GROUND WATER ELEVATION MAP

Total Attach: 4 Files

## General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)