

State of Colorado Oil and Gas Conservation Commission

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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: Phil Hamlin | Email: Phil_Hamlin@oxy.com | Mobile: () |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 5140

Initial Form 27 Document #: 2608077

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: LOCATION | Facility ID: 328928 | API #: | County Name: WELD |
| Facility Name: HSR-MOORHEAD-63N66W 5SWSW | | Latitude: 40.247878 | Longitude: -104.808553 |
| | | ** correct Lat/Long if needed: Latitude: 40.246836 | Longitude: -104.806753 |
| QtrQtr: SWSW | Sec: 5 | Twp: 3N | Range: 66W |
| | | Meridian: 6 | Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Commercial – Sod Farm

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

Water well and occupied building approximately 420 feet (ft) west, surface water approximately 650 ft east, and groundwater approximately 2 ft below ground surface (bgs).

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/Laboratory Analysis |
| Yes | SOILS | 50' N-S X 60' E-W X 5' 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 2010, soil with historical petroleum hydrocarbon impacts was encountered near the HSR-Chaknova 14-5, HSR-Moorhead 13-5, HSR-Bell 12-5, HSR-Creaseon 11-5 production tank while digging a trench for the emission control device lines. 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 February 4, 2010, ten soil samples were collected from the excavation base and sidewalls for laboratory analysis of total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Laboratory analytical results indicated that TPH and BTEX concentrations 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):

Groundwater was encountered in the excavation at approximately 4.5 ft bgs. On February 4, 2010, 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 levels for benzene, ethylbenzene, and total xylenes at concentrations of 3,400 micrograms per liter (µg/L), 1,200 µg/L, and 7,600 µg/L, respectively. 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 12

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 3000

NA / ND

-- Highest concentration of TPH (mg/kg) 4240

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 4

Groundwater

Number of groundwater samples collected 605

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 5'

Number of groundwater monitoring wells installed 18

Number of groundwater samples exceeding 910-1 111

-- Highest concentration of Benzene (µg/l) 4500

-- Highest concentration of Toluene (µg/l) 32

-- Highest concentration of Ethylbenzene (µg/l) 1200

-- Highest concentration of Xylene (µg/l) 7900

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?

Groundwater impacts were detected in the adjoining field north of the tank battery.

☐ 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 500 cubic yards of impacted soil were excavated 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 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.

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.

Due to persistent, elevated BTEX concentrations in multiple site monitoring wells, an air sparging (AS) and soil vapor extraction (SVE) system was installed at the site to remediate the dissolved-phase petroleum hydrocarbon plume. The AS/SVE system was designed to introduce ambient air into the subsurface water column to promote volatilization and aerobic microbial decomposition of dissolved-phase petroleum hydrocarbons. Installation and operation of the full-scale AS/SVE system occurred in February 2016. Kerr-McGee submitted a UIC Permit Application to Region 8 of the USEPA which was subsequently approved on March 17, 2015.

The AS/SVE system started up in February 2016. The system is comprised of eight wells connected by a combination of surface and subsurface high-density polyethylene piping to a remediation trailer powered by electricity. Two AS wells (AS-7 and AS-8) were added in March 2018 to increase system influence around the separators. The remediation system included valves at all the AS wellheads to allow for uninterrupted flow control, measurement, and adjustment. AS was initially accomplished using a 10-horsepower-driven Rietschle Thomas DLR 150 rotary-claw compressor, and SVE was accomplished using a Roots 47 U-RAI DSL rotary-lobe blower housed within the remediation trailer. The remediation trailer was shut down in June 2017, due to insufficient production gas to run the remediation trailer. Currently, a diesel-powered tow-behind air compressor is used to operate the AS system. The SVE system is no longer necessary due to lack of recoverable vapors.

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) 500

Name of Licensed Disposal Facility or COGCC Facility ID # 149007

No Excavate and onsite remediation

Land Treatment

Bioremediation (or enhanced bioremediation)

Chemical oxidation

Other

Groundwater Remediation Summary

Yes Bioremediation (or enhanced bioremediation)

No Chemical oxidation

Yes 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 MW17 are sampled on a quarterly basis and submitted for laboratory analysis of BTEX by United States Environmental Protection Agency Method 8260D. The Groundwater Elevation Contour Map generated using the December 2020 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical reports for the March 2020, June 2020, September 2020, and December 2020 groundwater monitoring events are attached.

Groundwater has been compliant with COGCC Table 910-1 allowable levels for BTEX as of the December 2020 groundwater monitoring event. If groundwater continues to remain compliant for three more quarters, this site will have achieved four consecutive quarterly monitoring events by September 2021. Kerr-McGee Oil and Gas Onshore, LP is requesting a variance to continue sampling groundwater for BTEX under the COGCC Table 910-1 standards, as defined under the 900 Series Rule 915.f. for Remediations in Progress. If compliance is lost and quarterly monitoring is projected to continue past January 15, 2022, groundwater monitoring will switch to include the full list of Table 915-1 analyses.

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 _____ 500

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? 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 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. 02/05/2010

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/04/2010

Date of commencement of Site Investigation. 02/04/2010

Date of completion of Site Investigation. 12/02/2014

REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/04/2010

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Pursuant to the recently approved Rule 915.f. for sites that are subject to an open Form 27, we are seeking the Director's approval to continue to seek compliance with Table 910-1 until such time that remediation is completed, or until January 15, 2022, whichever comes first.

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: 5140

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

| | |
|-----------|----------------------------|
| 402600976 | SITE MAP |
| 402601000 | GROUND WATER ELEVATION MAP |
| 402603376 | ANALYTICAL RESULTS |

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

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

Total: 0 comment(s)