

# 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:

402606935

Receive Date:

03/05/2021

Report taken by:

CHRIS CANFIELD

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

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 15868 Initial Form 27 Document #: 402471008

#### 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 checked="" 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

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>318080</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>ADDIE M. KING GAS UNIT-61N66W 4SWSW</u>	Latitude: <u>40.076140</u>	Longitude: <u>-104.788210</u>	
** correct Lat/Long if needed: Latitude: <u>40.076460</u>		Longitude: <u>-104.787821</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>4</u>	Twp: <u>1N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>478864</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.076460</u>	Longitude: <u>-104.787821</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>4</u>	Twp: <u>1N</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 Non-Crop Land

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

Multiple buildings are located within 1/4 mile of the facility.

# 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 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 sampling and laboratory analysis
Yes	SOILS	234' (E-W) x 128' (N-S) x 12' 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 December 7, 2020, historical impacts were discovered below the partially-buried produced water vessel (PWV) during abandonment activities at the King Addie M GU 1 production facility, and excavation activities were initiated. Groundwater was encountered in the excavation area at approximately 11 feet below ground surface (bgs). The COGCC issued Spill/Release Point ID 478864 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 sidewalls and base of the excavation area at depths ranging from approximately 2.5 to 12 feet bgs. The base soil samples were submitted to Origins Laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by USEPA Method 8260C, TPH diesel and oil range organics (DRO and ORO) by USEPA Method 8015, electrical conductivity (EC), pH, and sodium adsorption ratio (SAR). The sidewall soil samples were submitted for analysis of BTEX, naphthalene, and TPH. Analytical results indicated that constituent concentrations in the soil samples collected from the final extents of the excavation area were in full compliance with the COGCC Table 910-1 standards. Soil analytical data is presented in Table 1, and the soil sample locations are illustrated on Figure 1. The laboratory analytical reports are provided as Attachment A.

### 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 11 ft bgs. Sample GW01 was collected on December 14, 2020, and submitted for BTEX analysis. Analytical results indicated that the benzene, ethylbenzene, and total xylenes concentrations in GW01 exceeded COGCC Table 910-1 standards. On December 28, 2020, sample GW02 was collected from the excavation and submitted for BTEX analysis. Analytical results indicated that the benzene and total xylenes concentrations in GW02 remained above COGCC standards. On January 18, 2021, sample GW03 was collected from the excavation and submitted for analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-trimethylbenzene (TMB), chloride, sulfate, and total dissolved solids (TDS). Analytical results indicated that concentrations in GW03 were in compliance with COGCC Table 915-1 standards for organic compounds. Inorganic constituents in groundwater will be evaluated following monitoring well installation and determination of background concentrations.

### 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 2, and the groundwater sample locations are illustrated on Figure 1. The laboratory analytical reports are provided as Attachment A.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 136  
Number of soil samples exceeding 910-1 52  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 20200

### NA / ND

-- Highest concentration of TPH (mg/kg) 8474  
-- Highest concentration of SAR 12.25  
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 12

### Groundwater

Number of groundwater samples collected 3  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 11'  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 426  
ND Highest concentration of Toluene (µg/l)   
-- Highest concentration of Ethylbenzene (µg/l) 956  
-- Highest concentration of Xylene (µg/l) 16200  
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?

Soil exceeding COGCC standards extended laterally beyond the lease boundary. Laboratory analytical results indicate that impacted soils in the excavation area have been remediated to be in full compliance with the COGCC Table 910-1 standards.

☐ 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?

Groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of the remaining residual dissolved-phase groundwater impacts. The temporary groundwater monitoring wells will be sampled on a quarterly basis and submitted for laboratory analysis of BTEX, naphthalene, TMB, chloride, sulfate, and TDS until concentrations remain in full compliance with the COGCC Table 915-1 standards for four consecutive quarters.

# 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 December 7, 2020 and February 3, 2021, a total of approximately 7,077 cubic yards of impacted material were removed from the site. Approximately 5,950 cubic yards of impacted material were excavated and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Approximately 1,100 cubic yards of impacted material were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. Approximately 27 cubic yards of impacted material were hydro-excavated and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado. Approximately 1,635 barrels of impacted groundwater were removed from the excavation via vacuum truck and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado. Soils were excavated into the phreatic zone to address potential impacts that may have been present below the current groundwater table due to seasonal fluctuations.

## 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 in the excavation area have been remediated to be in full compliance with the COGCC Table 910 -1 standards. Prior to backfilling, approximately 990 pounds of OxPure® activated carbon were added to the excavation area to mitigate remaining hydrocarbon impacts in groundwater. The SDS for the activated carbon is provided as Attachment B. Groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of the remaining residual dissolved-phase groundwater impacts. Temporary groundwater monitoring wells will be sampled on a quarterly basis and submitted for laboratory analysis of BTEX, naphthalene, TMB, chloride, sulfate, and TDS until concentrations remain in full compliance with the COGCC Table 915-1 standards for four consecutive quarters. 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) 7077

Name of Licensed Disposal Facility or COGCC Facility ID # 149007

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

Yes Other Groundwater removal, OxPure®  
activated carbon 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 will be installed at the site to fully define the extent and magnitude of the remaining residual dissolved-phase groundwater impacts. The temporary groundwater monitoring wells will be sampled on a quarterly basis and submitted for laboratory analysis of BTEX, naphthalene, TMB, chloride, sulfate, and TDS until concentrations remain in full compliance with the COGCC Table 915-1 standards for four consecutive quarters. A groundwater monitoring location figure illustrating the locations of the surveyed temporary monitoring wells will be provided in a Form 27-Supplemental update.

## 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:

Approximately 1,100 cubic yards of hydrocarbon-impacted soil were transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. Approximately 27 cubic yards of hydrocarbon-impacted soil slurry were transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado, for recycling. Approximately 1,635 barrels of hydrocarbon-impacted groundwater were transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 7077

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

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

Non-COGCC Disposal Facility: Buffalo Ridge Landfill - Keenesburg,  
Colorado

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 1635

E&P waste (liquid) description \_\_\_\_\_ Hydrocarbon-impacted groundwater

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_ 434766

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 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. 12/14/2020

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

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 12/07/2020

Date of commencement of Site Investigation. 12/07/2020

Date of completion of Site Investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 12/07/2020

Date of completion of Remediation. \_\_\_\_\_

### **SITE RECLAMATION DATES**

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

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

**OPERATOR COMMENT**

Form 27-Supplemental updates will be submitted to the COGCC on a quarterly basis until the extent of groundwater impacts has been fully delineated.

Project timeline:

- Soil excavation activities completed between December 2020 and February 2021.
- Reclamation activities are ongoing at this time.
- Target monitoring well installation and implementation of quarterly groundwater monitoring during 2Q2021.
- Estimated time to closure will be determined pending monitoring well installation and evaluation of groundwater analytical data.

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: ` 03/05/2021

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: CHRIS CANFIELD

Date: 03/13/2021

Remediation Project Number: 15868

**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**

402606935	FORM 27-SUPPLEMENTAL-SUBMITTED
402607064	ANALYTICAL RESULTS
402607068	OTHER
402608156	SOIL SAMPLE LOCATION MAP
402608162	ANALYTICAL RESULTS
402608181	ANALYTICAL RESULTS

Total Attach: 6 Files

**General Comments****User Group****Comment****Comment Date**

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

Total: 0 comment(s)