

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 & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Phone: <u>(970) 336-3500</u>
	Zip: <u>80217-3779</u>	Mobile: <u>()</u>
Contact Person: <u>Phil Hamlin</u>	Email: <u>Phil_Hamlin@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 4013 Initial Form 27 Document #: 1881343

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>317962</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SARCHET LAURA A GAS UNIT-63N66W 21SWNE</u>	Latitude: <u>40.213190</u>	Longitude: <u>-104.778760</u>	
	** correct Lat/Long if needed: Latitude: <u>40.212829</u>	Longitude: <u>-104.778799</u>	
QtrQtr: <u>SWNE</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 SW Most Sensitive Adjacent Land Use Agriculture

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

Excavation groundwater approximately 16 feet (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 Samples/Lab Analysis
Yes	SOILS	90' N-S x 50' E-W x 23' bgs (max)	2007/2008 Excavations - Soil Samples/Lab 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 May 2007, soil with historical petroleum hydrocarbon impacts was encountered while tying new wells into the Laura Sarchet GU 1 tank battery. The wells were shut in and petroleum hydrocarbon impacted soil was excavated.

In November 2008, an operator left the production tank drain valve open to the water sump and left the site. Approximately 80 barrels of crude oil were released within the steel tank battery berm before the night operator arrived and closed the drain valve. A vacuum truck was used to recover 35 barrels of crude oil from inside the berm and the petroleum hydrocarbon impacted soil was excavated. The Site Map depicting the 2007 and 2008 excavations is attached as Figure 1.

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 May 9 and 10, 2007, five soil samples were collected from the 2007 excavation sidewalls 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.

On December 8 and 10, 2008, eleven soil samples were collected from the 2008 excavation for laboratory analysis of TPH. Laboratory analytical results indicated that TPH concentrations were in full compliance with the COGCC sensitive area allowable level 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):

On May 9, 2007, groundwater sample GW01 was collected from the 2007 excavation for laboratory analysis of BTEX. Laboratory analytical results indicated that sample GW01 exceeded the COGCC Table 910-1 allowable levels for benzene, toluene, and total xylenes at concentrations of 510 micrograms per liter (µg/L), 3,600 µg/L, and 11,000 µg/L, respectively.

On December 8, 2008, groundwater sample GW01 was collected from the 2008 excavation for BTEX analysis. Laboratory analytical results indicated that sample GW01 exceeded the COGCC Table 910-1 allowable levels for benzene, toluene, and total xylenes at concentrations of 6,100 µg/L, 12,000 µg/L, and 9,200 µg/L, respectively. The 2007 and 2008 excavation groundwater sample locations are depicted on Figure 1. The groundwater analytical results are summarized on Table 1.

Quarterly groundwater monitoring has been conducted at the site since August 2007.

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 16
Number of soil samples exceeding 910-1 3
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 4000

NA / ND

-- Highest concentration of TPH (mg/kg) 7200
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 12

Groundwater

Number of groundwater samples collected 834
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 3'
Number of groundwater monitoring wells installed 23
Number of groundwater samples exceeding 910-1 424

-- Highest concentration of Benzene (µg/l) 15000
-- Highest concentration of Toluene (µg/l) 12000
-- Highest concentration of Ethylbenzene (µg/l) 1100
-- Highest concentration of Xylene (µg/l) 15000
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 agricultural field northeast 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 363 cubic yards of impacted soil were removed from the 2007 excavation and approximately 1,650 cubic yards of impacted soil were removed from the 2008 excavation. The impacted soil was 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. Approximately 40 barrels of petroleum hydrocarbon impacted groundwater were removed from the 2008 excavation and transported to a licensed injection facility for disposal. The general site layout and 2007 and 2008 excavation footprints 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 the 2007 excavation, five gallons of MicroBlaze®, a concentrated solution of facultative microbes, nutrients, and surfactants designed to bioremediate petroleum hydrocarbons, were applied to the groundwater in the 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) _____ 2013
_____ 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 _____
Groundwater Removal and
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 MW01R through MW04, MW07 through MW13, TMW01, TMW02, TMW03, TMW05, and TMW10 through TMW16 are sampled on a quarterly basis. The groundwater samples were submitted for analysis of BTEX by United States Environmental Protection Agency Method 8260D through the fourth quarter 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 January 2021 monitoring event. Upgradient and compliant groundwater monitoring well MW14 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. Based on a comparison to background concentrations, point-of-compliance (POC) monitoring wells TMW05, TMW10, and TMW17 were above the Table 915-1 standards for inorganic constituents during the First Quarter 2021 monitoring event. Kerr-McGee will continue to evaluate POC for Table 915-1 on a quarterly basis based on the site-specific local background concentrations. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the January 2021 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical reports for the third quarter 2020 through first quarter 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 _____ 2013

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 _____ 40

E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: _____ 159255

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? _____

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? _____

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. 05/07/2007

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/09/2007

Date of commencement of Site Investigation. 05/07/2007

Date of completion of Site Investigation. 10/28/2016

REMEDIAL ACTION DATES

Date of commencement of Remediation. 05/07/2007

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Form 27 update reports will be submitted to the COGCC on a quarterly basis until the extent of groundwater impacts has been fully delineated based on Table 915-1 standards.

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: 04/14/2021

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: 04/14/2021

Remediation Project Number: 4013

Condition of Approval

COA Type

Description

<u>COA Type</u>	<u>Description</u>
0 COA	

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

<u>Att Doc Num</u>	<u>Name</u>
402639502	FORM 27-SUPPLEMENTAL-SUBMITTED
402639519	GROUND WATER ELEVATION MAP
402639521	SITE MAP
402657970	ANALYTICAL RESULTS

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	This report serves as adequate project summary and status update required to be submitted prior to April 15, 2021 as per rule 913.e.(2).	04/14/2021

Total: 1 comment(s)