

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
Candice (Nikki) Graber

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 #: 205 Initial Form 27 Document #: 1008388

PURPOSE INFORMATION

- 901.e. Sensitive Area Determination
- 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
- 909.c.(1), Rule 905: Pit or PW vessel closure
- Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
- 909.c.(2), Rule 906: Spill/Release Remediation
- Rule 909.e.(2)B.: Closure of remediation project
- 909.c.(3), Rule 907.e.: Land treatment of oily waste
- Rule 906.c.: Director request
- 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure
- Other _____

SITE INFORMATION

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>318170</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SARATOGA-64N66W 33SWSW</u>	Latitude: <u>40.263639</u>	Longitude: <u>-104.788361</u>	
	** correct Lat/Long if needed: Latitude: <u>40.263023</u>	Longitude: <u>-104.788298</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>33</u>	Twp: <u>4N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Agriculture and Livestock

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 located approximately 450 feet (ft) northeast, surface water located approximately 1,200 ft southwest, buildings located approximately 380 ft south, livestock located approximately 50 ft southwest, and groundwater at approximately 6 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 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	Unknown	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.

On May 20, 1994, the well operator discovered a hole in the side of an oil tank at the Saratoga 1 tank battery. Approximately 92 barrels (bbls) of crude oil were released into the bermed tank area. An unknown volume of crude oil seeped out of the tank berm onto the adjacent lease road. Approximately 40 bbls of oil were recovered from within the tank battery berm and transferred to another production tank. Basin Exploration, Inc. performed the initial site assessment in May 1994. The release was initially reported to the Colorado Oil and Gas Conservation Commission (COGCC) on August 5, 1994 via written notification.

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):

Details of the site assessment and remediation activities conducted by Basin Exploration, Inc. are summarized in a Spill Assessment and Remediation Status Report submitted to the COGCC on May 23, 1995.

In March 2005, three soil samples (MW01@12-15', MW02@12-15', and MW03@8-12') were collected from assessment soil borings MW01 through MW03 and submitted for laboratory analysis of total petroleum hydrocarbons (TPH). Laboratory analytical results indicated that the TPH concentration in soil sample MW01@12-15' exceeded the COGCC sensitive area allowable level of 1,000 milligrams per kilogram (mg/kg) at a concentration of 1,000 mg/kg. 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.

Proposed Groundwater Sampling

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

Quarterly groundwater monitoring has been conducted at the site since March 2005.

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 3
Number of soil samples exceeding 910-1 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 5000
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 15

Groundwater

Number of groundwater samples collected 824
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 6'
Number of groundwater monitoring wells installed 36
Number of groundwater samples exceeding 910-1 278

-- Highest concentration of Benzene (µg/l) 19000
-- Highest concentration of Toluene (µg/l) 230
-- Highest concentration of Ethylbenzene (µg/l) 2900
-- Highest concentration of Xylene (µg/l) 21000
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?

Petroleum hydrocarbon impacts to groundwater are present in monitoring wells in the adjoining agricultural field northwest of the tank battery facility. The monitoring well locations and general site layout are depicted in the Site Map attached as Figure 1.

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.

Please refer to the Form 27 submitted to the COGCC on May 11, 2015. Details of the site assessment and remediation activities conducted by Basin Exploration, Inc. are summarized in a Spill Assessment and Remediation Status Report submitted to the COGCC on May 23, 1995.

Based on the March 2005 subsurface soil assessment, petroleum hydrocarbon impacts to soil remain in place in the vicinity of soil boring/monitoring well MW01.

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.

Remedial options are under evaluation.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ 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 Microbial/Nutrient 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.

In December 2020, three additional groundwater monitoring wells (MW30 through MW32) were installed at the site. Boring logs with well completion diagrams are included as an attachment.

Groundwater monitoring wells MW01R, MW02, MW03R, MW04, MW05, MW07, MW09 through MW14, MW15R, MW17 through MW20, MW21R, and MW22 through MW32 are sampled on a quarterly basis. The groundwater samples were submitted for BTEX by United States Environmental Protection Agency Method 8260D through the December 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 March 2021 monitoring event. Cross-gradient and historically compliant groundwater monitoring well MW17 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the March 2021 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical reports for the June 2020, September 2020, December 2020 and March 2021 groundwater monitoring events are attached.

Groundwater monitoring will continue on a quarterly basis until a No Further Action status request is warranted.

REMEDATION 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? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

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? 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 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. 11/30/2020

Actual Spill or Release date, if known. 05/20/1994

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/20/1994

Date of commencement of Site Investigation. 07/14/1994

Date of completion of Site Investigation. 12/09/2020

REMEDIAL ACTION DATES

Date of commencement of Remediation. 05/20/1994

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: 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: Candice (Nikki) Graber

Date: 04/15/2021

Remediation Project Number: 205

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

402657121	FORM 27-SUPPLEMENTAL-SUBMITTED
402657140	LOGS
402657141	SITE MAP
402657158	GROUND WATER ELEVATION MAP
402658550	ANALYTICAL RESULTS

Total Attach: 5 Files

General Comments

User Group

Comment

Comment Date

Environmental	Updated landowner notification date based on conversation with Operator.	04/15/2021
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Total: 1 comment(s)