

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

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 3541 Initial Form 27 Document #: 1140804

#### 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: 318587	API #:	County Name: WELD
Facility Name: PAUL SCHMIDT GAS UNIT B-62N66W 20NENE		Latitude: 40.128090	Longitude: -104.795620
** correct Lat/Long if needed: Latitude: 40.130349		Longitude: -104.794704	
QtrQtr: NENE	Sec: 20	Twp: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Surface Water

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

Domestic water well and an occupied building approximately 650 feet (ft) northeast, surface water (irrigation ditch) approximately 35 ft southwest, wetlands approximately 350 ft southeast, livestock approximately 940 ft northwest, and groundwater 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 checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input 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 Samples/Lab Analysis
Yes	SOILS	60ft N-S x 105ft E-W x 15ft bgs	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.

The Paul Schmidt "B" GU 1 facility is a former Amoco facility, which was acquired by HS Resources/Kerr-McGee in 2003. Kerr-McGee has no information (date, cause volume, etc.) on the source of the release. On April 9, 2003, a Kerr-McGee foreman discovered five groundwater monitoring wells at the site. Two of the five groundwater monitoring wells had measurable free product. During site excavation activities in September 2009, a crushed concrete sump was uncovered. The Site Map depicting the general site layout and excavation area 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 ):

Please refer to the Form 27 submitted to the Colorado Oil and Gas Conservation Commission (COGCC) on August 1, 2003. In September 2009, 18 soil samples were collected from the base and sidewalls of the excavation and submitted 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 COGCC Table 910-1 allowable levels at the extent of the excavation.

### Proposed Groundwater Sampling

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

Groundwater monitoring has been conducted on a quarterly basis since April 2003. During the September 2009 excavation activities, groundwater was encountered in the southwestern portion of the excavation at approximately 15 ft bgs. On September 29, 2009, one groundwater sample (GW01) was collected and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated sample GW01 exceeded the COGCC Table 910-1 allowable level for benzene at 970 micrograms per liter (µg/L). The excavation groundwater sample location is depicted on Figure 1, and 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 ):

Surface water monitoring from the irrigation ditch has been conducted periodically since June 2003 and on a quarterly basis since August 2011.

## 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 29

Number of soil samples exceeding 910-1 7

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

Approximate areal extent (square feet) 6300

### NA / ND

-- Highest concentration of TPH (mg/kg) 9200

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 11

### Groundwater

Number of groundwater samples collected 1100

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 6'

Number of groundwater monitoring wells installed 42

Number of groundwater samples exceeding 910-1 366

-- Highest concentration of Benzene (µg/l) 75000

-- Highest concentration of Toluene (µg/l) 67000

-- Highest concentration of Ethylbenzene (µg/l) 4160

-- Highest concentration of Xylene (µg/l) 15000  
0

NA Highest concentration of Methane (mg/l)

### Surface Water

25 Number of surface water samples collected

1 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.

Please refer to the Form 27 submitted to the COGCC on August 1, 2003. In 2009, approximately 5,560 cubic yards of petroleum hydrocarbon impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. 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.

Free product recovery (bailing) is conducted bi-monthly in monitoring well MW05. Measurable product was last observed in monitoring wells MW01, MW02, and MW04 in December 2006, in monitoring wells MW03 and MW21 in March 2006, and in monitoring wells MW20 and MW24 in June 2009. Additional remedial options are under evaluation.

## 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.

In September 2009, while backfilling the excavation, 500 pounds of BOS 200®, a carbon-based remediation product, was applied to the excavation groundwater immediately prior to backfilling. The excavation area was restored to its pre-release grade, and the Kerr-McGee facility was reconstructed.

## 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) \_\_\_\_\_ 5560  
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 )  
Yes \_\_\_\_\_ Chemical oxidation  
No \_\_\_\_\_ Air sparge / Soil vapor extraction  
Yes \_\_\_\_\_ Natural Attenuation  
Yes \_\_\_\_\_ Other Groundwater Removal and BOS  
200® Application (2009) \_\_\_\_\_

## 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 MW05, MW08 through MW11R, MW16R, MW18R, MW20R through MW22R, and MW25 through MW28 and surface water sample Ditch-1 are sampled on a quarterly basis. The groundwater samples were submitted for BTEX by United States Environmental Protection Agency Method 8260D through 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 MW27 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. The monitoring well locations and surface water sample location are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the February 2021 survey data is provided as Figure 2. The groundwater and surface water analytical results are summarized in Table 1 and Table 2, respectively. The laboratory analytical reports for the May 2020, August 2020, November 2020, and February 2021 groundwater and surface water monitoring events are attached.

Groundwater and surface water 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 5560

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 1

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

COGCC Disposal Facility ID #, if applicable: 159443

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 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. 04/09/2003

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/09/2003

Date of commencement of Site Investigation. 04/09/2003

Date of completion of Site Investigation. 11/30/2016

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/09/2003

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: 04/15/2021

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: 04/15/2021

Remediation Project Number: 3541

### Condition of Approval

#### 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.
1 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

402659406	FORM 27-SUPPLEMENTAL-SUBMITTED
402659420	GROUND WATER ELEVATION MAP
402659421	SITE MAP
402660330	ANALYTICAL RESULTS

Total Attach: 4 Files

### General Comments

#### User Group

#### Comment

#### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)