

State of Colorado Oil and Gas Conservation Commission

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402659894

Receive Date:

04/15/2021

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>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Phil Hamlin</u>	Email: <u>Phil_Hamlin@oxy.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9787Initial Form 27 Document #: 200440043

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>SPILL OR RELEASE</u>	Facility ID: <u>445591</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.141908</u>	Longitude: <u>-104.672677</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>16</u>	Twp: <u>2N</u>	Range: <u>65W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use RangelandIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Domestic water well approximately 1,050 feet (ft) northwest, building approximately 1,350 ft west, livestock approximately 4,000 ft southeast, and groundwater approximately 45 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 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	54' N-S x 27' E-W x 45' 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.

In April 2016, two partially-buried produced water sumps were removed during tank battery deconstruction activities at the Four Way 1 facility. Soil with historical petroleum hydrocarbon impacts were encountered beneath the southern produced water sump. The petroleum hydrocarbon impacted soil was excavated to a depth of approximately 25 ft bgs. Based on August 2016 assessment activities, impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs.

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):

Between April 14 and 21, 2016, twelve soil samples were collected from the excavation for benzene, toluene, ethylbenzene, and total xylenes (BTEX), total petroleum hydrocarbons (TPH), pH, and specific conductance (EC). Laboratory analytical results indicated that benzene, total xylenes, TPH, and pH exceeded the Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the base of the excavation. In August 2016, a subsurface assessment was conducted to determine the extent of impacted soil in place. The assessment activities indicated that impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs. Please refer to the Form 27 Update Report submitted to the COGCC on October 28, 2016, for further details. The general site layout, excavation extent, and extent of impacted soil in place are depicted on the Site Map provided as Figure 1.

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 August 2016.

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 48

Number of soil samples exceeding 910-1 15

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 1458

NA / ND

-- Highest concentration of TPH (mg/kg) 16560

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 45

Groundwater

Number of groundwater samples collected 107

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 45

Number of groundwater monitoring wells installed 6

Number of groundwater samples exceeding 910-1 22

-- Highest concentration of Benzene (µg/l) 1410

-- Highest concentration of Toluene (µg/l) 7200

-- Highest concentration of Ethylbenzene (µg/l) 2460

-- Highest concentration of Xylene (µg/l) 33500

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?

☐ 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?

Petroleum hydrocarbon impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs. Prior to submittal of a No Further Action (NFA) status request, the impacted soil left in place will be reassessed for compliance with COGCC Table 910-1 allowable levels.

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.

The petroleum hydrocarbon impacted soil was excavated to a depth of approximately 25 ft bgs. Approximately 780 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to Buffalo Ridge Landfill in Keenesburg, Colorado, for disposal. Petroleum hydrocarbon impacted soil remains in place beneath the backfilled excavation to a depth of approximately 45 ft bgs. Please refer to the Form 27 Update Report submitted to the COGCC on October 28, 2016, for further details regarding the excavation and subsurface assessment activities. The excavation footprint and extent of the petroleum hydrocarbon impacted soil left in place 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.

Please refer to the Form 27 Update Report submitted to the COGCC on October 28, 2016, for initial remediation activities. Prior to submittal of an NFA status request, the impacted soil left in place beneath the backfilled excavation will be reassessed for compliance with COGCC Table 910-1 allowable levels.

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) _____ 780

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

No _____ 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

No _____ Other _____

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 MW06 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 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 July 2020, October 2020, and January 2021 groundwater monitoring events are attached.

Groundwater has been compliant with COGCC Table 910-1 allowable levels for BTEX as of the October 2020 groundwater monitoring event. If groundwater continues to remain compliant for two more quarters, this site will have achieved four consecutive quarterly monitoring events by July 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:

NA

Volume of E&P Waste (solid) in cubic yards _____ 780

E&P waste (solid) description _____ Petroleum hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

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

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? _____

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? 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 Kerr-McGee tank battery facility was deconstructed. The site was restored to its pre-release grade.

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. 04/21/2016

Actual Spill or Release date, if known. 04/20/2016

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/14/2016

Date of commencement of Site Investigation. 04/20/2016

Date of completion of Site Investigation. 08/09/2016

REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/20/2016

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 requesting 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: 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: 04/16/2021

Remediation Project Number: 9787

Condition of Approval**COA Type****Description**

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**

402659894	FORM 27-SUPPLEMENTAL-SUBMITTED
402660092	SITE MAP
402660094	GROUND WATER ELEVATION MAP
402660400	ANALYTICAL RESULTS

Total Attach: 4 Files

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

	sampling and analysis done after table 915-1 was in place were not compliant with rule 915 requirements in place. Request for use of Table 910-1 is conditionally approved with a minimum of sampling and analysis in at least 1 future quarter of Table 915-1 organic and inorganic constituents of concern before any request for closure will be considered.	04/16/2021
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Total: 1 comment(s)