

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 13729 Initial Form 27 Document #: 402034955

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>450468</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DANIEL V 11-1,9,10,15 TANK BATTERY</u>		Latitude: <u>40.145394</u>	Longitude: <u>-104.850899</u>
		** correct Lat/Long if needed: Latitude: <u>40.145455</u>	Longitude: <u>-104.850820</u>
QtrQtr: <u>SESE</u>	Sec: <u>11</u>	Twp: <u>2N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>463424</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Daniel V 11-15</u>		Latitude: <u>40.145452</u>	Longitude: <u>-104.850833</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SESE</u>	Sec: <u>11</u>	Twp: <u>2N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

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

Domestic water wells approximately 400 feet (ft) south (S), 1120 ft S, 640 ft southeast (SE), 860 ft SE, 640 ft southwest (SW), 1140 ft SW, 1180 ft west (W), 900 ft W, and 820 ft northwest (NW). Irrigation water well approximately 940 ft northeast (NE), and commercial water well approximately 1200 ft NE. Livestock approximately 1060 ft S, 160 ft east (E), and 320 ft north (N). Occupied structures approximately 500 ft E, 640 ft SE, 980 ft SE, 1100 ft S, 330 ft S, 1010 ft SW, 1100 ft SW, and 1200 ft NE. Lupton Bottom Ditch 135 ft E, and wetlands approximately 1160 ft N.

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	To be determined	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	59' (N-S) x 60' (E-W) x 14' bgs	Soil Samples/Laboratory Analytical Results

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 March 19, 2019, historical petroleum hydrocarbon impacts were discovered during site decommissioning activities associated with the closure of a partially buried produced water vessel (PWV) at the Daniel V 11-15 production facility. The volume of the release is unknown. A Topographic Site Location Map showing the geographic setting of the release is provided as Figure 1. The general site layout and extent of the excavation is provided as Figure 2.

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 March 19, 2019 and January 14, 2020, following removal of the PWV, 16 soil samples were collected from the sidewalls and base of the excavation. The base soil samples were submitted for laboratory analysis of BTEX, naphthalene, and total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260C, TPH-diesel range organics (DRO) and oil range organics (ORO) by USEPA Method 8015C, pH by USEPA Method 9045D, specific conductance (EC) by USEPA Method 9050A, and sodium adsorption ratio (SAR) by USDA Agricultural Handbook 60 Method 20B. The sidewall soil samples were submitted for laboratory analysis of BTEX, naphthalene, and TPH. The laboratory analytical results for the sidewall and base samples are in full compliance with COGCC Table 910-1 allowable levels at the final extent of the excavation. Soil analytical data is presented in Table 1.

Proposed Groundwater Sampling

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

On September 19, 2019, one groundwater sample (GW01) was collected from the excavation and submitted to Origins Laboratory in Denver, Colorado, for analysis of BTEX by USEPA 8260. The laboratory analytical results indicate that sample GW01 exceeded the COGCC Table 910-1 allowable levels for benzene at 165 µg/L. On January 10, 2020, following the removal of impacted groundwater, an additional groundwater sample (GW02) was collected from the excavation and submitted to Origins Laboratory in Denver, CO for analysis of BTEX by USEPA 8260. The laboratory analytical results indicate that sample GW02 exceeded the COGCC Table 910-1 allowable levels for benzene at 164 µg/L and total xylenes at 1420 µg/L. Groundwater analytical results are summarized in Table 2.

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 915-1 4
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 3540

NA / ND

-- Highest concentration of TPH (mg/kg) 3020
-- Highest concentration of SAR 3.79
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 14

Groundwater

Number of groundwater samples collected 2
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 915-1 2

-- Highest concentration of Benzene (µg/l) 165
-- Highest concentration of Toluene (µg/l) 113
-- Highest concentration of Ethylbenzene (µg/l) 280
-- Highest concentration of Xylene (µg/l) 1420
NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected
 Number of surface water samples exceeding 915-1
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?

Groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of any remaining petroleum hydrocarbon impacts. Site access for well installation is currently under consideration.

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 1380 cubic yards of soil were taken to the Kerr-McGee Landfarm in Weld County, Colorado. Approximately 5000 barrels of groundwater were removed from the excavation and taken to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado.

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.

While backfilling the excavation, 500 pounds of COGAC™, a carbon-based groundwater remediation product, was applied to the clean backfill to mitigate remaining hydrocarbon impacts in groundwater. In order to determine the extent and magnitude of the dissolved-phase hydrocarbon impacts, a minimum of five groundwater monitoring wells will be installed in the source area, crossgradient, and downgradient of the excavation footprint. Groundwater monitoring will be conducted on a quarterly basis.

Soil Remediation Summary

In Situ Ex Situ

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

Yes Excavate and offsite disposal
 If Yes: Estimated Volume (Cubic Yards) 1380
 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

Yes Bioremediation (or enhanced bioremediation)
 Yes Chemical oxidation
 No Air sparge / Soil vapor extraction
 Yes Natural Attenuation
 Yes Other Chemically Oxygenated
 Granular Activated Carbon
 (COGAC™) application and
 groundwater removal _____

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.

To determine the extent and magnitude of impacts, a minimum of five groundwater monitoring wells will be installed in the source area, cross-gradient, and downgradient of the excavation footprint. Site access and monitoring well placements are currently being considered. Subsequent to installation, the temporary groundwater monitoring wells will be sampled on a quarterly basis and submitted for laboratory analysis until concentrations remain in full compliance with the COGCC Table 915-1 standards for four consecutive quarters.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

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 1380 cubic yards of petroleum hydrocarbon impacted soil were transported to the Kerr-McGee Landfarm in Weld County, Colorado for recycling. Approximately 5000 barrels of petroleum 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 1380

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 5000

E&P waste (liquid) description Petroleum 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

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? No

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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 will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 03/19/2019

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/19/2019

Proposed site investigation commencement. 03/19/2019

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/19/2019

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

This form serves as a quarterly update to the remediation activities performed at this site under Remediation Project #13729. No additional assessment or remediation activities have been conducted at this site since the Supplemental Form 27 was submitted to the COGCC on March 27, 2020 (Document No. 402349543). Site access and monitoring well placements are currently being considered. As such, no additional groundwater sampling results are provided in this document. An implementation schedule is attached as Table 3. Once groundwater monitoring wells are installed onsite, groundwater monitoring will be conducted on a quarterly basis.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Phil Hamlin _____

Title: Sr. Env. Rep. _____

Submit Date: 06/24/2021 _____

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: PETER GINTAUTAS _____

Date: 06/24/2021 _____

Remediation Project Number: 13729 _____

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

0 COA	
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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**

402721380	FORM 27-SUPPLEMENTAL-SUBMITTED
402722702	OTHER

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)