

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
402800719
Receive Date:
09/21/2021

Report taken by:
CHRIS CANFIELD

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

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 #: 5516 Initial Form 27 Document #: 2524011

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: NFA Status Request

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>320316</u>	API #: _____	County Name: <u>ADAMS</u>
Facility Name: <u>WYMAN-61S67W 6NWSE</u>	Latitude: <u>39.990711</u>	Longitude: <u>-104.927856</u>	
** correct Lat/Long if needed: Latitude: <u>39.990966</u>		Longitude: <u>-104.927574</u>	
QtrQtr: <u>NWSE</u>	Sec: <u>6</u>	Twp: <u>1S</u>	Range: <u>67W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Pasture
 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 approximately 500 feet (ft) south, surface water approximately 550 ft west, wetlands approximately 500 ft west, buildings approximately 300 ft south, and groundwater approximately 6 ft below ground surface (bgs).

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- E&P Waste Other E&P Waste Non-E&P Waste
- Produced Water Workover Fluids
- Oil Tank Bottoms
- Condensate Pigging Waste
- Drilling Fluids Rig Wash
- Drill Cuttings Spent Filters
- Pit Bottoms
- Other (as described by EPA)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	See attached data	Groundwater Sampling/Lab Analysis
Yes	SOILS	35 ft N-S x 60 ft E-W x 8 ft bgs	Soil Sampling/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 2010, field crews encountered historical petroleum hydrocarbon impacted soil while installing new dump lines at the Wyman 33-6 tank battery facility. The petroleum hydrocarbon impacted soil was excavated. Groundwater was encountered in the excavation at approximately 8 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 May 26 and June 4, 2010, nine soil samples were collected from the excavation base and sidewalls for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX). Laboratory analytical results indicated that TPH and BTEX concentrations were in full compliance with Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the lateral extent of the excavation. Groundwater was encountered in the excavation at a depth of 8 ft bgs. 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 seasonal fluctuations. The excavation soil sample locations are depicted on Figure 1. The soil sample analytical results are summarized in Table 1.

Proposed Groundwater Sampling

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

On May 26, 2010, groundwater sample GW01 was collected from the excavation and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated sample GW01 exceeded the COGCC Table 910-1 allowable levels for benzene and toluene at concentrations of 840 micrograms per liter (µg/L) and 1,200 µg/L, respectively. The excavation groundwater sample location is depicted on Figure 2. The groundwater sample 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 9
Number of soil samples exceeding 915-1 3
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 2100

NA / ND

-- Highest concentration of TPH (mg/kg) 1670
NA Highest concentration of SAR
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 243
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 6'
Number of groundwater monitoring wells installed 23
Number of groundwater samples exceeding 915-1 33

-- Highest concentration of Benzene (µg/l) 840
-- Highest concentration of Toluene (µg/l) 1200
-- Highest concentration of Ethylbenzene (µg/l) 1200
-- Highest concentration of Xylene (µg/l) 14000
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?

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 530 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to Front Range Landfill in Erie, Colorado, for disposal. 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 seasonal fluctuations. The general site layout and excavation footprint are depicted on the Site Map attached as Figure 2.

REMEDICATION 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 June 2010, 10 gallons MicroBlaze®, a concentrated solution of facultative microbes, nutrients, and surfactants designed to bioremediate petroleum hydrocarbons, were applied to the groundwater immediately prior to backfilling the excavation.

As of the November 2016 quarterly monitoring event, monitoring wells MW01 and MW02 exceeded the COGCC Table 910-1 allowable level for benzene at 78.8 µg/L and 49.9 µg/L, respectively. MW01 also exceeded the allowable level for total xylenes at 1,550 µg/L. Following the November 2016 monitoring event, Kerr-McGee contracted LT Environmental, Inc. (LTE) to design and implement a carbon slurry injection program to remediate the residual dissolved-phase BTEX impacts to groundwater. Kerr-McGee submitted an Underground Injection Control (UIC) Permit Application to Region 8 of the United States Environmental Protection Agency (USEPA) on January 20, 2017.

The carbon slurry injection program was implemented, as outlined in the UIC Permit Application, with the objective of reducing the residual dissolved-phase BTEX concentrations in the injection area surrounding MW01 and MW02 to less than the COGCC allowable levels. Between March 6 and March 8, 2017, LTE oversaw the injection of approximately 900 pounds (dry weight) of BOS 200® that was mixed with potable water and cultured facultative microbes to form an injectable carbon slurry. The BOS 200® product is designed to enhance petroleum hydrocarbon degradation by capturing the dissolved-phase petroleum hydrocarbons in a carbon matrix and promoting microbial metabolism of the hydrocarbons under both aerobic and anaerobic conditions.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	Yes Excavate and offsite disposal
_____ Chemical oxidation	If Yes: Estimated Volume (Cubic Yards) _____ 530
_____ Air sparge / Soil vapor extraction	Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ 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)

Yes _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____ MicroBlaze® Application (2010)

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.

Between August 2010 and November 2019, twelve groundwater monitoring wells (MW01 through MW12) and eleven replacement monitoring wells (MW01R through MW11R) were installed at the site. Groundwater monitoring continued on a quarterly basis. The monitoring well locations are depicted on Figure 2. Boring logs with monitoring well completion diagrams are attached.

In December 2013, monitoring wells MW01 through MW06 were surveyed to obtain the relative groundwater and top-of-casing well elevation data. The survey data indicated the groundwater flow direction at the site is to the southeast and southwest. Between March 2017 and November 2019, monitoring wells MW07 through MW12 and MW01R through MW12R were surveyed to obtain the relative groundwater and top-of-casing well elevation data. The survey data indicated the groundwater flow direction at the site is to the northeast and northwest. Relative groundwater elevations are provided in Table 2. Groundwater Elevation Contour Maps for the fourth quarter 2020 through third quarter 2021 monitoring events are provided as Figures 3A through 3D, respectively.

As of the August 2021 quarterly monitoring event, BTEX concentrations in monitoring wells MW01R through MW11R were in full compliance with COGCC Table 910-1 allowable levels for four consecutive quarterly monitoring events. Monitoring well MW12 was dry for the duration of the monitoring program; however, based on the groundwater flow direction it was determined the well was not needed as a point of compliance. The groundwater analytical results are summarized in Table 2. The laboratory analytical reports for the four compliant groundwater monitoring events are attached.

Kerr-McGee Oil and Gas Onshore, LP has requested and been approved for 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.

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:

Volume of E&P Waste (solid) in cubic yards 530

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

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Front Range Landfill in Erie, 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? Yes

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? _____

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? No _____

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. _____

Actual Spill or Release date, or date of discovery. 05/27/2010

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/26/2010

Proposed site investigation commencement. 05/27/2010

Proposed completion of site investigation. 02/10/2020

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/27/2010

Proposed date of completion of Remediation. 08/02/2021

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

--

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: 09/21/2021

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: CHRIS CANFIELD

Date: 09/21/2021

Remediation Project Number: 5516

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

	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.
2 COAs	

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**

402800719	FORM 27-SUPPLEMENTAL-SUBMITTED
402801129	ANALYTICAL RESULTS
402801130	LOGS
402808460	SOIL SAMPLE LOCATION MAP
402808470	SITE MAP
402808482	GROUND WATER ELEVATION MAP

Total Attach: 6 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)