

State of Colorado
Oil and Gas Conservation Commission

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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 #: 9606 Initial Form 27 Document #: 2526091

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

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-08601</u>	County Name: <u>WELD</u>
Facility Name: <u>JACK BERGER C 1</u>	Latitude: <u>40.083268</u>	Longitude: <u>-104.873162</u>	
	** correct Lat/Long if needed: Latitude: <u>40.081505</u>	Longitude: <u>-104.873791</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>3</u>	Twp: <u>1N</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 Agriculture
 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 270 feet (ft) northwest, surface water approximately 590 ft south, wetlands approximately 890 ft north, an occupied building approximately 810 ft southeast, and groundwater approximately 9 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 Samples/Lab Analysis
Yes	SOILS	Excavation activities are ongoing	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 December 2015, a leak in the Jack Berger C GU 1 flow line was discovered. The volume of the release is unknown. In February 2016, additional impacted soil was encountered while deconstructing the tank battery. However, there was no indication of a secondary release associated with the tanks or dumphines. Petroleum hydrocarbon impacted soil was excavated; however, removal of all the impacted soil has been complicated by the presence of multiple, unmarked third-party flowlines.

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 Soil Sampling Summary Attachment.

Proposed Groundwater Sampling

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

On December 18, 2015, groundwater was encountered in the flowline excavation at approximately 9 ft bgs. One groundwater sample (GW01) was collected for BTEX analysis. Laboratory analytical results indicated benzene exceeded the COGCC Table 910-1 allowable level at a concentration of 1990 micrograms per liter (µg/L). The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized on Table 2.

Quarterly groundwater monitoring has been conducted at the site since May 2018.

Proposed Surface Water Sampling

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

[Empty text box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

[Empty text box for additional investigative actions]

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 55
Number of soil samples exceeding 915-1 19
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 9260

NA / ND

-- Highest concentration of TPH (mg/kg) 5322
NA Highest concentration of SAR _____
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 20

Groundwater

Number of groundwater samples collected 327
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 9'
Number of groundwater monitoring wells installed 30
Number of groundwater samples exceeding 915-1 79

-- Highest concentration of Benzene (µg/l) 3850
-- Highest concentration of Toluene (µg/l) 55
-- Highest concentration of Ethylbenzene (µg/l) 462
-- Highest concentration of Xylene (µg/l) 1700
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?

Petroleum hydrocarbon impacted soil was encountered in the agricultural field east of the former tank battery. Petroleum hydrocarbon impacted groundwater was encountered north, northwest, and south of the former tank battery.

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 120 cubic yards of petroleum hydrocarbon impacted soil were removed from the flow line and tank battery excavations and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. 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 past seasonal fluctuations. Petroleum hydrocarbon impacted soil remains in place north and south of the former tank battery. Subsurface assessment activities are ongoing. Additional details are included in the attached Soil Sampling Summary Attachment. The general site layout and excavation footprints are depicted on the Site Map provided as Figure 2.

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.

The petroleum hydrocarbon impacted soil was excavated and groundwater monitoring wells were installed and are sampled on a quarterly basis to assess monitored natural attenuation. Additional remedial options are under evaluation.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 120

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007

_____ Natural Attenuation

No _____ Excavate and onsite remediation

_____ Other _____

_____ 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 MW30 are sampled on a quarterly basis for the full list of analytes for groundwater in Table 915-1. Upgradient and historically compliant groundwater monitoring well MW28 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. The Groundwater Elevation Contour Map generated using the August 2021 survey data is provided as Figure 3. The groundwater analytical results are summarized in Table 1, and the laboratory analytical report for the August 2021 groundwater monitoring event is attached.

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

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:

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 _____ 120

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 _____ 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

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 Kerr-McGee facility was decommissioned. 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. 12/21/2015

Actual Spill or Release date, or date of discovery. 12/21/2015

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/11/2015

Proposed site investigation commencement. 12/11/2015

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/21/2015

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

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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: 09/22/2021 _____

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: 09/25/2021 _____

Remediation Project Number: 9606 _____

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**

402806542	FORM 27-SUPPLEMENTAL-SUBMITTED
402807874	SITE MAP
402807875	SITE MAP
402807877	GROUND WATER ELEVATION MAP
402807893	ANALYTICAL RESULTS
402819940	SITE INVESTIGATION REPORT

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)