

# State of Colorado Oil and Gas Conservation Commission

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Receive Date:

Report taken by:

## 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: KERR MCGEE OIL & GAS ONSHORE LP	Operator No: 47120	Phone Numbers Phone: (970) 336-3500 Mobile: (970) 515-1698
Address: P O BOX 173779		
City: DENVER	State: CO Zip: 80217-3779	
Contact Person: Gregory Hamilton	Email: Gregory_Hamilton@oxy.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20486 Initial Form 27 Document #: 402842917

#### 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: TANK BATTERY	Facility ID: 329585	API #: _____	County Name: WELD
Facility Name: HOUSTON-63N67W 17SENE	Latitude: 40.227200	Longitude: -104.907490	
** correct Lat/Long if needed: Latitude: 40.227416		Longitude: -104.908372	
QtrQtr: SENE	Sec: 17	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

  

Facility Type: SPILL OR RELEASE	Facility ID: 481301	API #: _____	County Name: WELD
Facility Name: Houston 17-8L Tank Battery Release	Latitude: 40.227439	Longitude: -104.908658	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 17	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Crop land

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? No

### Other Potential Receptors within 1/4 mile

Multiple buildings and livestock holding pens are located within ¼ mile of the facility.  
The nearest building is located approximately 1,150 feet southwest of the facility.  
The nearest domestic water well is located approximately 1,140 feet north of the facility.  
Surface water is located approximately 190 feet northwest of the facility.  
A wetland is located approximately 190 feet northwest of the facility.  
The facility is located within a ¼ mile of a designated high priority habitat.

## 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	SOILS	34' (E-W) x 32' (N-S) x 20' bgs	Inspection/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 December 17, 2021, facility decommissioning activities were conducted at the Houston 17-7L, 17-8L O SA Production Facility. On December 20, 2021, historical soil impacts were discovered below the former separator, dump lines, and produced water vessel (PWV), and additional excavation activities were initiated. Additionally, historical soil impacts were discovered during removal of the flowline riser for the associated Houston 17-8L wellhead at the location, where it was disconnected from the separator. Groundwater has not been encountered during facility decommissioning or subsequent excavation activities at this site. A Form 19-Initial/Supplemental Spill/Release Report was submitted on December 22, 2021, and the COGCC issued Spill/Release Point ID 481301. A partially-buried produced water vessel (PWV) was removed during facility decommissioning activities. Excavation and site assessment activities are ongoing, and will be summarized in a forthcoming Form 27-Supplemental update. On December 17, 2021, additional soil samples were also collected from the former separator, above-ground storage tank (AST), and PWV sidewall locations, at depths of approximately 3 inches to 4 feet below ground surface (bgs). These soil samples were submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, naphthalene, and total petroleum hydrocarbons (TPH) - gasoline range organics (GRO: C6-C10) by United States Environmental Protection Agency (USEPA) Method 8260D, and TPH - diesel and oil range organics (DRO: C10-C28 & ORO: C28-C40) by USEPA Method 8015D. Analytical results for the remaining soil samples collected from the former separator, AST, and PWV sidewall locations were in compliance with COGCC Table 915-1 standards. Soil sample location and field screening data are presented in Table 1. The soil sample and field screening locations are illustrated on 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 ):

Soil samples have been collected from the base and sidewalls of the separator/flowline riser/dump line excavation and the PWV excavation, at depths ranging from approximately 3 inches to 20 feet bgs. The initial soil samples (SEP-B02@3", DL-B02@3', FL-B05@3', PW-B01@5') were used for waste characterization and were submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite, using standard methods appropriate for detecting the target analytes. Analytical results indicated that soil impacts were present due to TPH, BTEX, TMB, and PAH concentrations above COGCC Table 915-1 standards. Based on the initial waste characterization soil analytical results, subsequent confirmation soil samples will continue to be submitted for laboratory analysis of BTEX, TMB, TPH, and PAHs. Excavation and site assessment activities are ongoing, and will be summarized in a forthcoming Form 27-Supplemental update. Soil analytical results are summarized in Tables 2 through 5.

#### Proposed Groundwater Sampling

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

Groundwater has not been encountered during facility decommissioning or subsequent excavation activities. If groundwater is encountered during ongoing excavation or site assessment activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4- and 1,3,5-TMB, using standard methods appropriate for detecting the target analytes in COGCC Table 915-1.

## 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 ):

On December 17, 2021, visual inspection and field screening of soils was conducted at one location below the former emission control device (ECD), one location at the former AST, three PWV sidewall locations, and two additional locations during dump line removal. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the COGCC Operator Guidance for Oil & Gas Facility Closure document. Soil and groundwater sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figure 1. The laboratory analytical reports are provided as Attachment A. The field notes and a photographic log are provided as Attachment B.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 17

Number of soil samples exceeding 915-1 5

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

Approximate areal extent (square feet) 535

### NA / ND

-- Highest concentration of TPH (mg/kg) 5290

-- Highest concentration of SAR 17.5

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 20

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 1

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 915-1 1

Highest concentration of Benzene (µg/l) 1

Highest concentration of Toluene (µg/l) 1

Highest concentration of Ethylbenzene (µg/l) 1

Highest concentration of Xylene (µg/l) 1

Highest concentration of Methane (mg/l) 1

### 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?

Background soil samples PW-BG01@2.5' - PW-BG03@2.5' and PW-BG01@5' - PW-BG04@5' were collected from native material adjacent to the production facility location, at depths of approximately 3 inches and 4 feet bgs. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters and Table 915-1 metals using standard methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are summarized in Tables 4 and 5.

☐ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 1

Volume of liquid waste (barrels) 1

☐ Is further site investigation required?

Impacted soil remains at the site. Excavation and site assessment activities are ongoing, and will be summarized in a forthcoming Form 27-Supplemental update.

## 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.

Between December 17, 2021 and March 2, 2022, approximately 50 cubic yards of impacted material have been excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling, and approximately 60 cubic yards of impacted material have been excavated and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Excavation activities are ongoing and impacted soil will continue to be transported off-site for disposal at a licensed disposal facility.

### **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.

Laboratory analytical results indicate that impacted soil remains at the former PWV location. Excavation activities to address remaining soil impacts are currently ongoing and will be summarized in a forthcoming Form 27-Supplemental update once complete. Estimated time to attain NFA is TBD based on the extent of soil impacts.

### **Soil Remediation Summary**

☐ In Situ

☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 110

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # 149007

Natural Attenuation

Excavate and onsite remediation

Other

Land Treatment

Bioremediation (or enhanced bioremediation)

Chemical oxidation

Other

### **Groundwater Remediation Summary**

Bioremediation ( or enhanced bioremediation )

Chemical oxidation

Air sparge / Soil vapor extraction

Natural Attenuation

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.

## 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 Remediation progress update

### 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 50 cubic yards of impacted soil have been transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 110

E&P waste (solid) description Impacted soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: Buffalo Ridge Landfill - 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

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?

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? \_\_\_\_\_

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. 12/21/2021

Actual Spill or Release date, or date of discovery. 12/20/2021

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 12/17/2021

Proposed site investigation commencement. 12/17/2021

Proposed completion of site investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 12/17/2021

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**

Excavation and site assessment activities are ongoing. Based on the initial waste characterization soil analytical results, subsequent confirmation soil samples will continue to be submitted for laboratory analysis of BTEX, TMB, TPH, and PAHs. Form 27-Supplemental updates will be submitted to the COGCC 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: Gregory Hamilton

Title: Environmental Consultant

Submit Date:

Email: Gregory\_Hamilton@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:

Date:

Remediation Project Number: 20486

**COA Type****Description**

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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**

402987683	PHOTO DOCUMENTATION
402987684	ANALYTICAL RESULTS
402987685	ANALYTICAL RESULTS
402987732	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)