

# State of Colorado Oil and Gas Conservation Commission

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02/15/2023

Report taken by:

Alexander Ahmadian

## 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	<b>Phone Numbers</b> Phone: (720) 929-4306 Mobile: ( )
Address: P O BOX 173779		
City: DENVER	State: CO Zip: 80217-3779	
Contact Person: Erik Mickelson	Email: Erik_Mickelson@oxy.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9297 Initial Form 27 Document #: 200437747

#### 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: thermogenic methane in GW

#### SITE INFORMATION

No Multiple Facilities

Facility Type: NONFACILITY	Facility ID: 453967	API #:	County Name: WELD
Facility Name: 752520 73N66W	Latitude: 40.234400	Longitude: -104.815500	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWSE	Sec: 7	Twp: 3N	Range: 66W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SM  
 Most Sensitive Adjacent Land Use IRRIGATED  
 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**

Groundwater.

**SITE INVESTIGATION PLAN****TYPE OF WASTE:**☐ E&P Waste ☐ Other E&P Waste ☒ Non-E&P Waste☐ Produced Water ☐ Workover Fluids Thermogenic Gas☐ 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	thermogenic gas present in GW	sampling and 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.

A temporary water system was installed in 2013 to provide potable water for the Henrickson residence. The water well was disconnected from the residence at that time. An assessment is currently underway to determine which, if any, producing gas well in the area is the source of the dissolved hydrocarbon in the water well. Even though no source has yet been identified, in January of 2014 Kerr-McGee provided a domestic water tap to the Henrickson residence, as a permanent solution.

**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 ):

**Proposed Groundwater Sampling**

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

The subject water well (permit #15631) has been on a quarterly sampling schedule since the 3rd quarter of 2013. No samples were collected the 1st and 2nd quarters of 2014 due to surface damages to the well casing, and a failure of the well pump. From May 2015 through February 2019 the subject water well was sampled every other month. From February 2019 through November 2021 the subject water well was sampled quarterly. Due to a decline in thermogenic impacts, the sample frequency was reduced to twice a year starting in 2022. All water samples will be analyzed per COGCC Rule 615e(2-4) constituents, at a minimum. Notification requirements in COGCC Rule 615e(4)C will be followed, as appropriate.

**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 ):

Kerr-McGee is currently investigating their production wells within a 3/4 mi radius of the subject water well. Any production well identified as a potential source will be sampled (production gas, and if present, any gas/liquids in the bradenhead) for comparison to the impacts in the subject water well. Any production well with identified integrity issues will be properly remediated.

**SITE INVESTIGATION REPORT**

## **SAMPLE SUMMARY**

### **Soil**

Number of soil samples collected 0

Number of soil samples exceeding 915-1           

Was the areal and vertical extent of soil contamination delineated?           

Approximate areal extent (square feet)           

### **NA / ND**

           Highest concentration of TPH (mg/kg)           

           Highest concentration of SAR           

BTEX > 915-1           

Vertical Extent > 915-1 (in feet)           

### **Groundwater**

Number of groundwater samples collected 41

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 90

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

--            Highest concentration of Benzene (µg/l) 7.8

--            Highest concentration of Toluene (µg/l) 233

ND            Highest concentration of Ethylbenzene (µg/l)           

ND            Highest concentration of Xylene (µg/l)           

--            Highest concentration of Methane (mg/l) 76

### **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?

Kerr-McGee is continuing to assess, and as needed, remediate their production wells in the vicinity of the subject water well.

## **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.

Any production well identified as a potential source of the impact to the subject water well will be remediated. Once the source has been eliminated, natural attenuation of the impact is expected.

## **REMEDATION 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.

Analytical data from samples collected this past year confirm a continued overall decline in the degree of thermogenic impacts to the water well. Continued natural attenuation is expected.

## **Soil Remediation Summary**

☐ In Situ

☐ Ex Situ

           Bioremediation ( or enhanced bioremediation )

           Excavate and offsite disposal

☐ Chemical oxidation  
☐ Air sparge / Soil vapor extraction  
☐ Natural Attenuation  
☐ Other \_\_\_\_\_

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_  
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
☐ Excavate and onsite remediation  
☐ Land Treatment  
☐ Bioremediation (or enhanced bioremediation)  
☐ Chemical oxidation  
☐ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

☐ Bioremediation ( or enhanced bioremediation )  
☐ Chemical oxidation  
☐ Air sparge / Soil vapor extraction  
☐ Yes 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.

See comments under Proposed Groundwater Sampling in the Site Investigation Plan section of this document.

## 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

### Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

KMOG has sufficient insurance and bonding to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. KMOG currently has over 40 million in bonds with the Colorado Oil and Gas Conservation Commission. The cost for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. KMOG makes no representation of guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 15000

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

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

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes

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.

N/A

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. 04/11/2013

Actual Spill or Release date, or date of discovery. 04/11/2013

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/11/2013

Proposed site investigation commencement. 04/11/2013

Proposed completion of site investigation. 12/31/2015

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/01/2016

Proposed date of completion of Remediation. 07/01/2025

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**

Summary data tables and laboratory analytical reports for the 2022 sampling events are attached. Analytical results were uploaded to the COENV database via Form 43 (Document #s 403087875 & 403235768). For 2023, Kerr-McGee will continue to sample the subject water well on a semi-annual basis as identified in the Proposed Groundwater Sampling section. Kerr-McGee will continue an annual Form 27 reporting schedule, as approved by the Director under COGCC Rule 913.e.

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

Signed: Erik Mickelson

Title: Environmental Lead

Submit Date: 02/15/2023

Email: Erik\_Mickelson@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: Alexander Ahmadian

Date: 03/24/2023

Remediation Project Number: 9297

**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**

403319162	FORM 27-SUPPLEMENTAL-SUBMITTED
403319266	ANALYTICAL RESULTS
403319267	ANALYTICAL RESULTS
403319269	ANALYTICAL RESULTS
403319273	ANALYTICAL RESULTS
403319276	ANALYTICAL RESULTS

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)