

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Taylor Robinson

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) 515-1698 Mobile: ()
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 #: 23400 Initial Form 27 Document #: 403057576

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: TANK BATTERY	Facility ID: 444997	API #: _____	County Name: WELD
Facility Name: POPE 11-35/SCOTSDALE O SA 34002151		Latitude: 40.266088	Longitude: -104.865612
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: _____	Sec: 35	Twp: 4N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Surface Water

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

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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
UNDETERMINED	GROUNDWATER	TBD	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	TBD	Soil Samples/Laboratory Analytical Results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures taken to abate, investigate, and/or remediate impacts associated with E&P Waste.

This form has been prepared to summarize ongoing assessment activities conducted during the closure of two aboveground storage tanks (ASTs), one produced water vessel, one emission control device (ECD), four meter houses, and two separators at the Pope 11-35/Scottsdale O SA Facility. Assessment activities began on June 16, 2022. Soil assessment activities are being conducted in accordance with COGCC Rule 911.a. A photo log is attached.

On June 20, 2022, upon receipt of the laboratory analytical report for samples collected on June 16, 2022, historically impacted soil was discovered at the facility. Laboratory analytical results indicated the AST soil samples AST01@6"-WP and AST02@6"-WP and PWV soil sample PWV-S01@2.5'-WP exceeded the COGCC Table 915-1 allowable levels for total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, total xylenes, 1,2,4-trimethylbenzene, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, fluorene, arsenic, cadmium, lead, and/or selenium. The release was reported to the COGCC in the Form 19 Initial dated June 27, 2022 (Document No. 403083771). The volume of the release is unknown. Excavation activities are ongoing.

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 June 16 and November 29, 2022, soil samples were collected from the ASTs, PWV, ECD, meter houses, and ancillary piping (Figure 1). The samples were field screened for total volatile organic compounds using a photoionization detector (PID). Based on PID readings, select soil samples were submitted for analysis. Excavation activities are ongoing. Separator samples have not yet been collected. The PID readings and soil sample results are summarized in Table 1 and Table 2, respectively, and the laboratory reports are attached.

Proposed Groundwater Sampling

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

On September 15, 2022, one groundwater sample was collected from the excavation and submitted for Table 915-1 analyses. Based on the laboratory analytical results, groundwater was within the COGCC Table 915-1 allowable levels for organic compounds. A background sample for inorganic compound comparison has not yet been collected. The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 3, and the laboratory report is attached.

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 37

Number of soil samples exceeding 915-1 33

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

Approximate areal extent (square feet) 1910

NA / ND

-- Highest concentration of TPH (mg/kg) 15523

-- Highest concentration of SAR 1

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 14

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 13

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

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?

One tank battery background soil sample was collected and submitted for laboratory analysis of pH, specific conductivity (EC), sodium adsorption ratio (SAR), boron, and metals. Laboratory analytical results indicate that pH, arsenic, and barium are naturally high in the soil used to construct the tank battery.

Sixteen native soil samples were collected as part of the Platte 11-35 & Pope 11-35 wellheads closure activities (Rem No. 20764), and submitted for laboratory analysis of pH, EC, SAR, boron, and metals. Laboratory analytical results indicate that pH, EC, SAR, arsenic, barium, and selenium are naturally high in the native soil. The wellheads background sample locations are depicted on Figure 2.

☐ 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 to delineate the plume. A remedial plan will be submitted after delineation has been completed. The monitoring well installation scope of work will be submitted in a subsequent Form 27 supplemental report.

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.

Impacted soils will be transported to a licensed disposal facility. Final disposal quantities will be provided once excavation is complete. Disposal records will be kept on file and available upon request.

REMEDIAL 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.

Impacted soils have been transported to a licensed disposal facility.

Groundwater monitoring wells will be installed to delineate the plume. A remedial plan will be submitted after delineation has been completed. The monitoring well installation scope of work will be submitted in a subsequent Form 27 supplemental report.

Soil Remediation Summary

☐ **In Situ**

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

☐ **Ex Situ**

_____ Excavate and offsite disposal

_____ 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

_____ 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.

Groundwater monitoring wells will be installed to delineate the plume. Groundwater samples will be collected from the monitoring wells on a quarterly basis and will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, total dissolved solids, chloride ion, and sulfate ion per COGCC Rule 912.a. Due to the metal exceedances in the proposed soil to be left in place (as discussed in the Proposed Soil Sampling section), the groundwater samples will also be analyzed for dissolved arsenic and lead in accordance with the Water Quality Control Commission Regulation 41. The laboratory analytical and assessment results will be summarized in a supplemental Form 27.

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 Facility Closure Assessment Update

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 or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 25000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

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? _____

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. 06/20/2022

Actual Spill or Release date, or date of discovery. 06/20/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/16/2022

Proposed site investigation commencement. 06/16/2022

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/16/2022

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

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: 02/10/2023

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: Taylor Robinson

Date: 03/28/2023

Remediation Project Number: 23400

COA Type**Description**

	Operator will continue quarterly reporting until the site investigation is complete and the implementation schedule can be updated.
1 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**

403266010	FORM 27-SUPPLEMENTAL-SUBMITTED
403311192	PHOTO DOCUMENTATION
403311194	SOIL SAMPLE LOCATION MAP
403311195	SOIL SAMPLE LOCATION MAP
403311196	SOIL SAMPLE LOCATION MAP
403312557	ANALYTICAL RESULTS
403312558	SOIL SAMPLE LOCATION MAP

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)