

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
403312119  
Receive Date:  
02/10/2023

Report taken by:  
Laurel Anderson

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 &amp; GAS ONSHORE LP</u>                   | Operator No: <u>47120</u> | <b>Phone Numbers</b><br>Phone: <u>(970) 515-1698</u><br>Mobile: <u>( )</u> |
| Address: <u>P O BOX 173779</u>   |                           |  |
| City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>                    |                           |  |
| Contact Person: <u>Gregory Hamilton</u> Email: <u>Gregory_Hamilton@oxy.com</u> |                           |  |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16278 Initial Form 27 Document #: 402575099

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: <u>WELL</u>                         | Facility ID: _____         | API #: <u>123-10185</u>       | County Name: <u>WELD</u>  |
| Facility Name: <u>ELLANORA M ACKERSON GAS UNIT</u> | Latitude: <u>40.075906</u> | Longitude: <u>-104.853925</u> |   |
| 2  |                            |                               |   |
| ** correct Lat/Long if needed: Latitude: _____     |                            | Longitude: _____              |   |
| QtrQtr: <u>SWSE</u>                                | Sec: <u>2</u>              | Twp: <u>1N</u>                | Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

|   |                            |                               |   |
|---|----------------------------|-------------------------------|---|
| Facility Type: <u>SPILL OR RELEASE</u>          | Facility ID: <u>479697</u> | API #: _____                  | County Name: <u>WELD</u>  |
| Facility Name: <u>Ackerson, Ellanora M GU 2</u> | Latitude: <u>40.075916</u> | Longitude: <u>-104.853929</u> |   |
| ** correct Lat/Long if needed: Latitude: _____  |                            | Longitude: _____              |   |
| QtrQtr: <u>SWSE</u>                             | Sec: <u>2</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 SM

Most Sensitive Adjacent Land Use Agriculture and  
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**

# 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                                    |
|-----------|----------------|-------------------------|---|
| No        | GROUNDWATER    | No impacts encountered. | Groundwater Samples/Laboratory Analytical Results |
| Yes       | SOILS          | See attached data.      | 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 March 16, 2021, historically impacted soil was discovered in the wellhead excavation following the cut and cap of the Ackerson Ellanora M GU 2 wellhead and excavation activities were conducted. The COGCC issued Spill/Release Point ID 479697 for this release. Non-impacted groundwater was encountered in the excavation at approximately 8 feet below ground surface (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 ):

Soil samples were collected as described in a previous Form 27-Supplemental update (COGCC Document No. 402974682). Based on the data presented, impacted soils in the excavation area were removed and the remaining soils at this location are in compliance with the applicable COGCC Table 915-1 standards and/or within the range of site-specific background results. Current soil conditions at this site are in compliance with COGCC Table 915-1 standards. The final excavation extent is illustrated on Figure 1.

### Proposed Groundwater Sampling

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

Non-impacted groundwater was encountered in the wellhead cut and cap excavation at approximately 8 feet bgs. On February 22, 2021, one groundwater sample was collected from the wellhead excavation for Table 915-1 analyses. One background groundwater sample was collected on April 8, 2021 and submitted for Table 915-1 inorganic parameters. Based on the laboratory analytical results and the comparison to the background concentrations of inorganic parameters, groundwater concentrations for all samples were in full compliance with COGCC Table 915-1 allowable levels. The excavation groundwater sample location and the locations of proposed temporary monitoring wells are depicted on Figure 1. The groundwater sample analytical results are summarized in Table 1 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

NA / ND

Number of soil samples collected 2  
 Number of soil samples exceeding 915-1 1  
 Was the areal and vertical extent of soil contamination delineated? Yes  
 Approximate areal extent (square feet) 225

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
 -- Highest concentration of SAR 4.08  
 BTEX > 915-1 No  
 Vertical Extent > 915-1 (in feet) 11

**Groundwater**

Number of groundwater samples collected 1  
 Was extent of groundwater contaminated delineated? Yes  
 Depth to groundwater (below ground surface, in feet) 8  
 Number of groundwater monitoring wells installed 0  
 Number of groundwater samples exceeding 915-1 0

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?  
 Six background soil samples were collected for laboratory analysis of pH, specific conductivity (EC), sodium adsorption ration (SAR), boron, and metals. Laboratory analytical results indicated that levels of arsenic, barium, cadmium, lead, and selenium are naturally high in the soil.  
 One background groundwater sample was also collected and submitted for Table 915-1 inorganic parameters.

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?  
 Based on the groundwater monitoring COA that was issued by the COGCC for the previous Form 27-Supplemental (Document No. 402974682), temporary groundwater monitoring wells will be installed at the site to continue monitoring clean groundwater conditions. Subsequent to installation, the temporary groundwater monitoring wells will be sampled for four consecutive quarters and samples will be submitted for laboratory analysis of the Table 915-1 organic constituents [benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (1,2,4-TMB) and 1,3,5-trimethylbenzene (1,3,5-TMB)].

**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 35 barrels of non-impacted water were removed from the site and transported to Aggregate Recycle Facility (ARF) in Weld County, Colorado, for recycling. Approximately 180 cubic yards of impacted soil were removed from the site and transported to Front Range Landfill in Erie, Colorado, for disposal. Disposal records are kept on file and available upon request.

**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 impacted soil has been excavated and transported to a licensed disposal facility. Current soil conditions at this site are in compliance with COGCC Table 915-1 standards. Laboratory analytical results indicate that current groundwater conditions at this site are in compliance with COGCC Table 915-1 standards. Based on the groundwater monitoring COA that was issued by the COGCC for the previous Form 27 Supplemental report (Document No. 402974682), temporary groundwater monitoring wells will be installed at the site to continue monitoring clean groundwater conditions. Subsequent to installation, the temporary groundwater monitoring wells will be sampled for four consecutive quarters and samples will be submitted for laboratory analysis of the Table 915-1 organic constituents (BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB). The estimated time to attain NFA is four quarters from the date of monitoring well installation and initiation of groundwater monitoring.

**Soil Remediation Summary**

In Situ

Ex Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

- Yes \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 180
- \_\_\_\_\_ 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.

Based on the groundwater monitoring COA that was issued by the COGCC for the previous Form 27 Supplemental report (Document No. 402974682), temporary groundwater monitoring wells will be installed at the site to continue monitoring clean groundwater conditions. Subsequent to installation, the temporary groundwater monitoring wells will be sampled for four consecutive quarters and samples will be submitted for laboratory analysis of the Table 915-1 organic constituents (BTEX, naphthalene, 1,2,4-TMB, and 1,3,5-TMB). The estimated time to attain NFA is four quarters from the date of monitoring well installation and initiation of groundwater monitoring.

# 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 Project Status 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: \$ 35000

## 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 35 barrels of non-impacted water were removed from the site and transported to Aggregate Recycle Facility (ARF), for recycling.

Volume of E&P Waste (solid) in cubic yards 180

E&P waste (solid) description Historically 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? 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? 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.

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. 03/17/2021

Actual Spill or Release date, or date of discovery. 03/16/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/22/2021

Proposed site investigation commencement. 02/22/2021

Proposed completion of site investigation. 12/31/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/22/2021

Proposed date of completion of Remediation. 12/31/2023

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: Laurel Anderson

Date: 04/14/2023

Remediation Project Number: 16278

**COA Type****Description**

|        |   |
|--------|---|
|        | Operator will submit a minimum of one soil sample from each soil boring advanced during monitoring well installation for laboratory analysis for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)). |
|        | Concentrations of lead, 1-Methylnaphthalene and 2-Methylnaphthalene exceeded the Table 915-1 Groundwater Protection Soil Screening Level and remain in-situ. Therefore Operator shall include lead, 1-Methylnaphthalene and 2-Methylnaphthalene in quarterly groundwater monitoring.  |
|        | Operator has not defined the lateral extents naphthalene, 1-methylnaphthalene, 2-methylnaphthalene nor lead above the respective Protection of Groundwater Soil Screening Level Concentrations in soils. Operator shall define the lateral extent of impacts over Protection of Groundwater Soil Screening Level Concentrations prior to requesting closure.                                |
|        | Operator shall provide a comprehensive list of all potential receptors within ¼ mile on the subsequent Supplemental Form 27.  |
|        | No documentation of a flowline investigation has been provided. Operator will conduct an environmental investigation along the path of the flowline. Operator shall conduct a closure investigation in accordance with Rule 911.a.(4) Guidance Document.  |
| 5 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**

|           |                                |
|-----------|--------------------------------|
| 403312119 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403312958 | GROUND WATER SAMPLE LOCATION   |
| 403315487 | ANALYTICAL RESULTS             |

Total Attach: 3 Files

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

|               |  |            |
|---------------|--|------------|
| Environmental | COGCC added Spill ID 479697 and selected Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912. in addition to the current selection. | 04/14/2023 |
|---------------|--|------------|

Total: 1 comment(s)