

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
403330040  
Receive Date:  
03/03/2023

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: <u>KERR MCGEE OIL &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b> Phone: <u>(970) 515-1698</u> 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 #: 22930 Initial Form 27 Document #: 403023541

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>LOCATION</u>	Facility ID: <u>327743</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-SMOLOWE-63N66W 1NESE</u>	Latitude: <u>40.252880</u>	Longitude: <u>-104.717620</u>	
	** correct Lat/Long if needed: Latitude: <u>40.249309</u>	Longitude: <u>-104.715933</u>	
QtrQtr: <u>NESE</u>	Sec: <u>1</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC 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**

--

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input checked="" type="checkbox"/> Oil            | <input type="checkbox"/> Tank Bottoms                |  |
| <input checked="" type="checkbox"/> Condensate     | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> Other (as described by EPA) |  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
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.

This form has been prepared to summarize assessment activities conducted during the closure of two aboveground storage tanks (ASTs), one produced water vessel (PWV), two meter houses, one emission control device (ECD), and one separator the Smolowe/Phipps 9 & 10-1 O SA Facility. The ASTs, PWV, meter houses, ECD, and separator were permanently removed. Assessment activities began on May 24, 2022. Soil assessment activities were conducted in accordance with COGCC Rule 911.a. A photo log is included as an attachment.

On May 25, 2022, upon receipt of the laboratory analytical report for samples collected on May 24, 2022, historically impacted soil was discovered in the facility excavation. Laboratory analytical results indicated the separator soil samples Sep01-Inlet01@5'-WP and Sep01-Outlet@4'-WP exceeded the COGCC Table 915-1 Protection of Groundwater Soil Screening Level Concentrations (PGSSLs) for total petroleum hydrocarbons (TPH), 1,2,4-trimethylbenzene (1,2,4-TMB), and/or 1,3,5-trimethylbenzene (1,3,5-TMB). Kerr-McGee Oil & Gas Onshore, LP (Kerr-McGee) reported the release to the COGCC in the Form 19 Initial dated May 26, 2022 (Document No. 403059202). The volume of the release is unknown. The impacted soil was excavated.

On February 10, 2023, the COGCC approved Kerr-McGee's request to apply Residential Soil Screening Levels (RSLs) to the Smolowe/Phipps 9 & 10-1 O SA Facility.

## 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 ):

From May 24 to November 4, 2022, soil samples were collected from the ASTs, PWV, meter houses, ECD, separator and ancillary piping (Figure 1). The soil samples were screened for volatile organic compounds using a photoionization detector (PID). Based on PID readings, select soil samples were submitted for analysis in accordance with COGCC Rule 911.a. Analytical results indicated soil was in full compliance with Table 915-1 RSLs or below the analytical variability of background samples at the extents of the excavations. The PID readings and sample results are summarized in Table 1 and Table 2, respectively.

### Proposed Groundwater Sampling

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

Groundwater was not encountered.

### 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 ):

While potholing to expose lines near the separator excavation, impacted soil was identified at the facility. Based on PID readings, select soil samples were submitted for laboratory analysis in accordance with COGCC Rule 911.a. Analytical results indicated soil was in full compliance with Table 915-1 standards, or below the analytical variability of background samples, at the extents of the excavation.

The flowlines associated with the Katzen 16-1 and Rocky Mountain wellheads that were previously left-in-place were removed during the Smolowe/Phipps 9 & 10-1 O SA Facility decommissioning activities. Based on PID readings at the flowline potholes and the lack of bends in the flowlines, no samples were submitted for analysis. The pothole locations are depicted on Figure 2 and the PID readings are summarized in Table 1.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 53

Number of soil samples exceeding 915-1 29

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 4071

### NA / ND

-- Highest concentration of TPH (mg/kg) 4030

-- Highest concentration of SAR 9.67

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 25

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)         

Number of groundwater monitoring wells installed         

Number of groundwater samples exceeding 915-1         

Highest concentration of Benzene (µg/l)         

Highest concentration of Toluene (µg/l)         

Highest concentration of Ethylbenzene (µg/l)         

Highest concentration of Xylene (µg/l)         

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 sample and eight native soil background soil samples were collected for laboratory analysis of specific conductivity (EC), sodium adsorption ratio (SAR), pH, boron, and metals. Laboratory analytical results indicated arsenic and selenium are naturally high in the soil used to construct the tank battery and arsenic, barium, and selenium are naturally high in the native soil.

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 200 cubic yards of impacted soil were removed from the site and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling. Approximately 3,420 cubic yards of impacted soil were removed from the site and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Disposal records are kept on file and are available upon request.

### REMEDICATION 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.

### 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) 3620
- Name of Licensed Disposal Facility or COGCC Facility ID # 149007
- No  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.

# REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

### Approved Reporting Schedule:

Quarterly     Semi-Annually     Annually     Other \_\_\_\_\_

### Request Alternative Reporting Schedule:

Semi-Annually     Annually     Other Final Report

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 NFA Status Request

## 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: \$ 0

## 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 200 cubic yards of impacted soil were removed from the site and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 3620

E&P waste (solid) description Impacted Soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: Buffalo Ridge Landfill in Keenesburg, CO (3420 CY)

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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. 05/25/2022

Actual Spill or Release date, or date of discovery. 05/25/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/24/2022

Proposed site investigation commencement. 05/24/2022

Proposed completion of site investigation. 12/08/2022

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/24/2022

Proposed date of completion of Remediation. 12/08/2022

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**

Based on the analytical and soil screening data provided herein, assessment is complete and Kerr-McGee is requesting an NFA determination for this location.

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: 03/03/2023

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: Alexander Ahmadian

Date: 04/27/2023

Remediation Project Number: 22930

**COA Type****Description**

	<p>Based on the information presented, it appears that no further remedial action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required. This no further action determination is limited to environmental remediation. Operator is required to comply with COGCC 1100 Series Rules for Flowline Regulations for all Flowline Abandonment activities and COGCC 400 Series Rules for Wellhead Plugging and Abandonment.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>
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**

403330040	FORM 27-SUPPLEMENTAL-SUBMITTED
403333293	ANALYTICAL RESULTS
403333296	SOIL SAMPLE LOCATION MAP
403334704	PHOTO DOCUMENTATION

Total Attach: 4 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)