

State of Colorado Oil and Gas Conservation Commission

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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	Phone Numbers Phone: (970) 336-3500 Mobile: ()
Address: P O BOX 173779		
City: DENVER	State: CO Zip: 80217-3779	
Contact Person: Phil Hamlin	Email: Phillip_Hamlin@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 4292 Initial Form 27 Document #: 1983837

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: LOCATION	Facility ID: 328940	API #: _____	County Name: WELD
Facility Name: HSR-DIEFENBACH-64N66W 34NWSE		Latitude: 40.266860	Longitude: -104.761290
		** correct Lat/Long if needed: Latitude: 40.264154	Longitude: -104.759954
QtrQtr: NWSE	Sec: 34	Twp: 4N	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use Wetlands 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

A water well approximately 500 feet (ft) south, surface water (unlined irrigation canal) approximately 50 ft south, wetlands approximately 100 ft north, an occupied building approximately 920 ft south, livestock approximately 225 ft south, and groundwater approximately 1 ft below ground surface (bgs).

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	GROUNDWATER	See Attached Data	Groundwater Samples/Lab Analysis
Yes	SOILS	15' NW-SE x 12' NE-SW x 4' bgs	Soil Samples/Lab 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.

In March 2008, the production well at the HSR-Diefenbach 10-34 facility produced more water than anticipated, resulting in the partially-buried produced water sump to overflow and spill approximately 6 barrels (bbls) of produced water onto the ground surface within the earthen containment berm. A vacuum truck was used to recover approximately 4 bbls of produced water from the ground surface. The petroleum hydrocarbon impacted soil was excavated.

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 March 18 and 28, 2008, seven soil samples were collected from the excavation base and sidewalls for laboratory analysis of total petroleum hydrocarbons (TPH). Laboratory analytical results indicated that the TPH concentrations were in full compliance with the Colorado Oil and Gas Conservation Commission (COGCC) sensitive area allowable level of 1,000 milligrams per kilogram (mg/kg) at the extent of the excavation. The soil samples were not analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) as the samples were collected prior to the April 1, 2009, COGCC rule changes.

The French Frahm 916-34 O SA facility (also known as the HSR-Diefenbach 10-34 facility) is being decommissioned and the infrastructure will be permanently removed. Additional soil samples will be collected as part of the facility decommissioning activities. Please refer to the Form 27 Initial dated January 26, 2023 (Remediation No. 27595; Document No. 403301263) for more details.

Proposed Groundwater Sampling

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

Groundwater was encountered in the excavation at approximately 4 ft bgs. On March 27, 2008, groundwater sample GW01 was collected from the excavation and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated sample GW01 exceeded the COGCC Table 910-1 allowable level for benzene at a concentration of 34 micrograms per liter (µg/L). The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 1.

Proposed Surface Water Sampling

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

On March 31, 2008, surface water sample SW01 was collected and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated that the BTEX concentrations in sample SW01 were less than the laboratory reporting limit.

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 7
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 180

NA / ND

-- Highest concentration of TPH (mg/kg) 6600
NA Highest concentration of SAR
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 1

Groundwater

Number of groundwater samples collected 756
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 0
Number of groundwater monitoring wells installed 38
Number of groundwater samples exceeding 915-1 179

-- Highest concentration of Benzene (µg/l) 4730
-- Highest concentration of Toluene (µg/l) 420
-- Highest concentration of Ethylbenzene (µg/l) 3200
-- Highest concentration of Xylene (µg/l) 55000
NA Highest concentration of Methane (mg/l)

Surface Water

1 Number of surface water samples collected
0 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?

Groundwater impacts were detected in the adjoining pasture and wetlands north of the tank battery pad.

☐ 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?

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 25 cubic yards of impacted soil were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. The general site layout and excavation footprint are depicted on the Site Map provided as Figure 1.

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.

Prior to backfilling the excavation, 2.5 gallons of MicroBlaze®, a concentrated solution of facultative microbes, nutrients, and surfactants designed to bioremediate petroleum hydrocarbons, were applied to the groundwater in the excavation.

Additional remedial alternatives may be evaluated once the French Frahm 916-34 O SA facility (also known as the HSR-Diefenbach 10-34 facility) has been decommissioned and additional data has been collected.

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) _____ 25
_____ 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

Yes _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
Yes _____ Other _____ MicroBlaze® Application

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 MW01, MW02R, MW03R, MW04, MW05R2, MW06, MW07R3, MW08R2, MW09R3, MW10R2, MW11R, MW13 - MW19R, and MW21 are sampled on a quarterly basis for the full list of analyses for groundwater in Table 915-1. Cross-gradient and historically compliant groundwater monitoring well MW16 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the January 2023 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1. The laboratory analytical reports for the April 2022, July 2022, October 2022, and January 2023 groundwater monitoring events are attached.

Groundwater monitoring will continue on a quarterly basis until a No Further Action status request is warranted.

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 or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 100000

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:

The petroleum hydrocarbon impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 25

E&P waste (solid) description Petroleum hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility:

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? No

Is additional groundwater monitoring to be conducted? Yes

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 was restored to its pre-release grade. The Kerr-McGee production facility remains at the site.

Is the described reclamation complete? No

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. 02/23/2021

Actual Spill or Release date, or date of discovery. 03/14/2008

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/14/2008

Proposed site investigation commencement. 03/18/2008

Proposed completion of site investigation. 01/21/2020

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/14/2008

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

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

Signed: Phil Hamlin

Title: Senior Environmental Rep.

Submit Date: 03/23/2023

Email: Phillip_Hamlin@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: 05/11/2023

Remediation Project Number: 4292

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**

403345289	FORM 27-SUPPLEMENTAL-SUBMITTED
403349735	ANALYTICAL RESULTS
403351056	SITE MAP
403351058	GROUND WATER ELEVATION MAP

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)