

# State of Colorado Energy & Carbon Management Commission

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Document Number:

403379853

Receive Date:

05/26/2023

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>
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 515-1698</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>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 27339 Initial Form 27 Document #: 403295700

#### 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>LOCATION</u>	Facility ID: <u>336314</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>JUNCTION-62N68W 2NWSW</u>	Latitude: <u>40.167070</u>	Longitude: <u>-104.975990</u>	
** correct Lat/Long if needed: Latitude: <u>40.167089</u>		Longitude: <u>-104.975423</u>	
QtrQtr: <u>NWSW</u>	Sec: <u>2</u>	Twp: <u>2N</u>	Range: <u>68W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>484183</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Junction 11, 12, 22-2 O SA Facility</u>	Latitude: <u>40.167089</u>	Longitude: <u>-104.975423</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSW</u>	Sec: <u>2</u>	Twp: <u>2N</u>	Range: <u>68W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

## **SITE CONDITIONS**

General soil type - USCS Classifications SM

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**

Residential Buildings

## **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 take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Decommissioning activities at the Junction 11, 12, 22-2 O SA Facility were completed on March 30, 2023. Groundwater was not encountered during excavation activities. Visual inspection and field screening of soil at three aboveground storage tanks (ASTs), one produced water vessel (PWV), one emission control device (ECD), one meter house, two separators, and potholes were conducted following removal activities and soil samples AST01@0.5', AST02@0.5', AST03@2', PWV-B01@6', PWV01-N01@3', Sep01-Inlet@4', Sep02-Inlet@4', Sep02-Outlet@3.5', and FL01@4' were submitted for laboratory analysis of Table 915-1 constituents including benzene, toluene, ethylbenzene, xylenes (BTEX), 1,2,4- and 1,3,5-trimethylbenzenes (TMBs), naphthalene, total petroleum hydrocarbons (TPH)-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO), Table 915-1 polycyclic aromatic hydrocarbons (PAHs), pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and Table 915-1 metals. Laboratory analytical results for AST03@2' and FL01@4' indicated that TPH, benzene, xylenes, TMBs, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, SAR, and boron impacts exceeding COGCC Table 915-1 allowable levels were present at the former facility. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 403363351) was submitted on April 6, 2023 and the COGCC issued Spill/Release Point ID 484183. The analytical results for the remaining soil samples were within compliance of the COGCC Table 915-1 standards or within range of site-specific background values. The soil sample locations are depicted on Figure 1. The PID readings and soil sample results are summarized in Table 1 and Table 2, respectively.

## 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 ):

On March 30, 2023, nine confirmation soil samples were collected from the ASTs, PWV, separator and ancillary piping at depths ranging from 0.5 feet below ground surface (ft bgs) to 6 ft bgs. The soil samples were submitted for laboratory analysis of full list Table 915-1 constituents using COGCC-approved methods. Analytical results indicated that constituent concentrations in the soil samples collected from AST03@2' and FL01@4' exceeded the COGCC Table 915-1 standards and/or the analytical variability of background levels for TPH, benzene, xylenes, TMBs, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, SAR, and boron. Excavation activities are ongoing. The PID readings and soil sample results are summarized in Table 1 and Table 2, respectively, and the laboratory report is attached.

### Proposed Groundwater Sampling

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

Groundwater was not encountered during facility decommissioning activities.

### 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 ):

On March 30, 2023, visual inspections and field screening of soil was conducted at the base, hatch, and loadout for each of the four ASTs, three sidewalls of the PWV excavation, one pothole, the meter house inlet, and the ECD. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the COGCC Operator Guidance. Soil screening locations are depicted on Figure 1. The PID readings and soil sample results are summarized in Table 1 and Table 2, respectively, and the laboratory report is attached. A photographic log is attached.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 9

Number of soil samples exceeding 915-1 9

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

Approximate areal extent (square feet) 416

### NA / ND

-- Highest concentration of TPH (mg/kg) 10220

-- Highest concentration of SAR 17.4

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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 soil sample (TB-BG01@0.5') was collected from unimpacted material used to construct the tank battery. The sample was submitted for laboratory analysis of pH, EC, SAR, boron, and metals. Laboratory analytical results indicate that levels of arsenic are naturally high in the soil used to construct the tank battery.

Six background soil samples (Native-BG01@3' through Native-BG03@3' and Native-BG01@6' through Native-BG03@6') were collected as part of the Junction 11, 12, 22-2 wellhead and flowline closure activities (Remediation No. 27343) from native material adjacent to the wellhead cut and cap excavations. The background soil samples were submitted for laboratory analysis of EC, SAR, pH, boron, and metals. Laboratory analytical results indicate that EC, SAR, arsenic, barium, lead, and selenium are naturally high in the native soil. Analytical results for the background soil samples are presented in Table 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?

Excavation activities are ongoing. Confirmation soil sample results will be summarized in a subsequent Form 27 Supplemental report within 90 days following the completion of excavation activities.

## 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 soil from the facility excavation will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of excavation activities. Disposal records will be kept on file and available upon request. The excavation area will be backfilled and contoured to match pre-existing conditions.

## REMEDIAL ACTION 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.

Laboratory data indicate that impacts exceeding the COGCC Table 915-1 standards and background levels for TMBs, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, SAR, and pH remain in the AST03@2' and FL01@4' excavation areas. Groundwater was not encountered in any of the facility excavations. Confirmation soil sample results will be summarized in a subsequent Form 27 Supplemental report within 90 days following the completion of excavation activities.

## **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.

## 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: \$ 19500

### 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. 04/03/2023

Actual Spill or Release date, or date of discovery. 04/03/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/30/2023

Proposed site investigation commencement. 03/30/2023

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/30/2023

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: Sr. Env. Consultant

Submit Date: 05/26/2023

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: 07/27/2023

Remediation Project Number: 27339

**COA Type****Description**

	Operator shall analyze confirmation soil samples for all Table 915-1 Organic Contaminants of Concern and Soil Suitability Parameters until Operator has submitted sufficient characterization data to request and receive Director Approval of reduced list of contaminants of concern.
	Operator shall provide a comprehensive list of all potential receptors within ¼ mile on the subsequent Supplemental Form 27.  Please note that Approval of this Form 27 does not supersede any Federal, State or Local regulations. ECMC recommends consultation with Colorado Parks and Wildlife.
	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
3 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**

403379853	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403380962	ANALYTICAL RESULTS
403380963	PHOTO DOCUMENTATION
403391810	SOIL SAMPLE LOCATION MAP
403478680	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

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

Environmental	ECMC added Spill ID 484183 and selected Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912. in addition to the current selection.	07/27/2023
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Total: 1 comment(s)