

# State of Colorado Energy & Carbon Management 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: <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) 515-1161</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Phil Hamlin</u>	Email: <u>Phillip_Hamlin@oxy.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20436 Initial Form 27 Document #: 402787685

#### 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>323198</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>BIERIG-UPRR-64N66W 35SENE</u>	Latitude: <u>40.270239</u>	Longitude: <u>-104.737533</u>	
** correct Lat/Long if needed: Latitude: <u>40.269559</u>		Longitude: <u>-104.737545</u>	
QtrQtr: <u>SENE</u>	Sec: <u>35</u>	Twp: <u>4N</u>	Range: <u>66W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

#### SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Irrigation Canal and 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

Platte Valley Ditch located approximately 75 feet to the southwest; domestic well located approximately 1,200 feet southwest; Occupied buildings located approximately 1,300 feet southwest

## 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	To be determined	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	Data previously submitted.	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 July 28, 2021, a release daylighting from the subsurface at the Berig 17-35 location was discovered. The impacted soil was discovered while performing a pressure test of the oil dumphine between the separator and the tank at the facility. Approximately 3 gallons of oil were released during the pressure test. The release was reported to the ECMC in the Form 19 Initial dated July 29, 2021 (Document No. 402732214). The volume of the release is unknown. The 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 July 29, 2021 and June 2, 2022, soil samples were collected from the facility excavation (see Figure 1). The soil samples were field screened for total volatile organic compounds using a photoionization detector (PID). Based on PID readings, select soil samples were submitted for laboratory analysis in accordance with ECMC Rule 911.a. The impacted soil was excavated. Analytical results indicated soil was in full compliance with Table 915-1 standards, or below background, at the extents of the excavation.

#### Proposed Groundwater Sampling

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

On July 29, 2021, four groundwater samples were collected from the facility excavation and flowline potholes and submitted for Table 915-1 analyses. One background groundwater sample was also collected and submitted for Table 915-1 inorganic parameters. Based on the laboratory analytical results, samples GW01 and GW03 exceeded the ECMC Table 915-1 allowable levels for benzene, toluene, xylenes, 1,2,4-trimethylbenzene, and/or 1,3,5-trimethylbenzene. The excavation groundwater sample and background sample locations are 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 August 12, 2021, six ditch water samples (Ditch-01 through Ditch-06) and one surface water sample (SW-01) were collected and submitted for Table 915-1 organic parameters. Results were compared to ECMC Table 915-1 allowable levels for groundwater. All ditch water sample results were non-detect. Toluene was detected in surface water sample SW-01; however, the concentration of 2.57 ug/L is well below the Table 915-1 allowable level for groundwater of 560 ug/L. The surface water sample locations are depicted on Figure 2. The surface water analytical results are presented in Table 2.

### 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 98

Number of soil samples exceeding 915-1 37

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

Approximate areal extent (square feet) 19886

### NA / ND

-- Highest concentration of TPH (mg/kg) 1468

-- Highest concentration of SAR 421

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 13

### Groundwater

Number of groundwater samples collected 12

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 2

Number of groundwater monitoring wells installed 8

Number of groundwater samples exceeding 915-1 4

-- Highest concentration of Benzene (µg/l) 1480

-- Highest concentration of Toluene (µg/l) 3070

-- Highest concentration of Ethylbenzene (µg/l) 238

-- Highest concentration of Xylene (µg/l) 4560

NA Highest concentration of Methane (mg/l)

### Surface Water

7 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?

☒ Were background samples collected as part of this site investigation?

One tank battery soil background soil sample and two 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 is naturally high in the soil used to construct the tank battery and the native soil.

One background groundwater sample was also collected and submitted for Table 915-1 inorganic parameters. Laboratory analytical results indicated sulfate ion is naturally high in the native groundwater. The background groundwater sample is depicted on Figure 1.

☐ 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?

Additional groundwater monitoring wells may be installed to continue evaluating point of compliance (POC) after additional rounds of groundwater sampling using the current well network have been completed.

## 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 22,828 bbls of impacted water and 140 CY of impacted soil were transported to the Aggregate Recycle Facility in Weld County, Colorado for recycling. Approximately 15,620 CY of impacted soil were transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling. Approximately 20 CY of impacted soil was transported to the Front Range Landfill in Erie, Colorado for disposal. Approximately 2,500 CY of impacted soil was transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Disposal records are kept on file and are available upon request.

## 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.

On May 22, 2023, eight groundwater monitoring wells were installed in order to determine the extent and magnitude of any remaining impacts. Quarterly groundwater monitoring of the newly-installed well network was initiated on June 26, 2023. Analytical results from all monitoring wells indicated that groundwater is in full compliance with Table 915-1 standards for organic constituents. POC for inorganic constituents is currently under evaluation. The boring logs and well construction diagrams are provided as an attachment.

On May 30, 2023, the ECMC approved the previous Form 27 Supplemental report for the site dated April 28, 2023 (Document No. 403372877) and included a condition of approval (COA) to collect soil samples during monitoring well installation. Monitoring wells were installed on May 22, 2023, prior to receipt of the May 30, 2023 COA and, therefore, no soil samples were collected during monitoring well installation.

## Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation ( or enhanced bioremediation )	Yes    Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards)    18280
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or COGCC Facility ID #    149007
_____ Natural Attenuation	No    Excavate and onsite remediation
_____ Other _____	_____ 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.

In May 2023, groundwater monitoring wells MW01 through MW08 were installed at the site. The soil boring logs and monitoring well completion diagrams are attached.

Groundwater monitoring wells MW01 through MW08 are now being sampled on a quarterly basis for the full list of analytes for groundwater in Table 915-1. Upgradient background pothole groundwater sample GW-BG01 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. POC for inorganic constituents is currently under evaluation. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the June 2023 survey data is provided as Figure 3. The groundwater analytical results are summarized in Table 1, and the laboratory analytical report for the June 2023 groundwater monitoring event is 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 Energy and Carbon Management 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 22,828 bbls of impacted water and 140 CY of impacted soil were transported to the Aggregate Recycle Facility in Weld County, Colorado for recycling. Approximately 15,620 CY of impacted soil were transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 18280

E&P waste (solid) description Impacted Soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: Front Range Landfill in Erie, CO (20 CY); Buffalo Ridge Landfill in Keenesburg, CO (2,500 CY)

Volume of E&P Waste (liquid) in barrels 22828

E&P waste (liquid) description Impacted Water

COGCC Disposal Facility ID #, if applicable: 434766

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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 will be reclaimed in accordance with ECMC 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. 08/25/2021

Actual Spill or Release date, or date of discovery. 06/28/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/28/2021

Proposed site investigation commencement. 06/28/2021

Proposed completion of site investigation. 12/31/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/28/2021

Proposed date of completion of Remediation. 12/30/2027

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: Phil Hamlin

Title: Senior Environmental Rep.

Submit Date: 07/21/2023

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: 08/21/2023

Remediation Project Number: 20436

**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**

403468693	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403468713	LOGS
403468716	SITE MAP
403468717	GROUND WATER ELEVATION MAP
403470033	SITE MAP
403470036	ANALYTICAL RESULTS
403503451	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)