

State of Colorado Energy & Carbon Management Commission

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Document Number:

403545246

Receive Date:

10/03/2023

Report taken by:

Taylor Robinson

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 & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		Mobile: <u>(970) 515-1698</u>
Contact Person: <u>Gregory Hamilton</u>	Email: <u>Gregory_Hamilton@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28990 Initial Form 27 Document #: 403356086

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>306751</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>CALLEN-USX N-65N67W 27NWNE</u>	Latitude: <u>40.375620</u>	Longitude: <u>-104.876451</u>	
** correct Lat/Long if needed: Latitude: <u>40.377633</u>		Longitude: <u>-104.876451</u>	
QtrQtr: <u>NWNE</u>	Sec: <u>27</u>	Twp: <u>5N</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 Crop Land

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

Multiple buildings and livestock holding pens are located within ¼ mile of the facility.
The nearest building is located approximately 570 feet southwest of the facility.
The nearest domestic water well is located approximately 700 feet north of the facility.
Surface water is located approximately 690 feet southwest of the facility.
A wetland is located approximately 690 feet southwest of the facility.

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	SOILS	No hydrocarbon impacts encountered	Inspection/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.

Tank battery decommissioning activities were completed at the Scott N 27-1, 8 O SA production facility location on July 5 and August 17, 2023. Groundwater was not encountered during these activities. Water visible in the attached photo log is due to rainwater/surface runoff collecting at the surface and within the excavation areas, above the tank battery secondary containment liner, which was verified to be intact, and not groundwater. Subsequent soil sampling was conducted below the tank battery following its removal on August 17, 2023, and groundwater was not encountered during these activities. Visual inspection and field screening of soils at the former production facility infrastructure locations was conducted following decommissioning activities, and seven (7) soil samples were submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results indicated that pH was slightly elevated in samples AST1-B02@3", SEP1-B01@3", SEP1-B02@3", and PW1-B02@4". Analytical results indicated that the remaining constituent concentrations in the soil samples collected during tank battery decommissioning activities were in compliance with ECMC Table 915-1 standards. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 and 3. The soil sample and field screening locations are illustrated on Figure 2.

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 July 5 and August 17, 2023, 7 confirmation soil samples were collected from the former separator (SEP), above-ground storage tank (AST), and partially-buried produced water vessel (PWV) locations, at depths ranging from approximately 3 inches to 4 feet below ground surface (bgs), and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-TMB, TPH-GRO (C6-C10), DRO (C10-C28), and ORO (C28-C40), pH, EC, SAR, and boron using standard ECMC-approved methods appropriate for detecting the target analytes. Analytical results indicated that constituent concentrations were in compliance with ECMC Table 915-1 standards, with exception to the pH results for samples AST1-B02@3", SEP1-B01@3", SEP1-B02@3", and PW1-B02@4". However, the pH results were within the acceptable range of analytical variability, and they alone do not indicate that a hydrocarbon release occurred at the former production facility. As such, this material was determined to be acceptable to leave in-place.

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. Water visible in the attached photo log is due to rainwater/surface runoff collecting at the surface and within the excavation areas, above the tank battery secondary containment liner, which was verified to be intact, and not groundwater. Subsequent soil sampling was conducted below the tank battery following its removal on August 17, 2023, and groundwater was not encountered during these 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 July 5 and August 17, 2023, visual inspection and field screening of soils was conducted at 3 sidewall locations within the PWV removal excavation area, 2 locations below the former AST, 1 location below the former enclosed combustion device (ECD), and 3 locations at the former meter houses (MH). Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations, and no soil samples were submitted for laboratory analysis from these areas in accordance with the ECMC Operator Guidance document. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 and 3. The soil sample and field screening locations are illustrated on Figure 2. The laboratory analytical reports are provided as Attachment A. The field notes and a photographic log are provided as Attachment B.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7

Number of soil samples exceeding 915-1 4

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

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 4.34

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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?

Background soil samples BG01@3" - BG04@3" were collected from native material adjacent to the former production facility location. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters using standard ECMC-approved methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are presented in Table 3.

☐ 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.

Laboratory results indicated that constituent concentrations in the 7 confirmation soil samples collected from the former AST, SEP, and PWV locations were in compliance with ECMC Table 915-1 standards, with exception to the pH values for samples AST1-B02@3", SEP1-B01@3", SEP1-B02@3", and PW1-B02@4". However, the pH results were within the acceptable range of analytical variability, and these results alone do not indicate that a hydrocarbon release occurred at the former production facility location. As a result, this material was determined to be acceptable to leave in-place, and no soils were removed during facility decommissioning operations. The excavation areas were backfilled and contoured to match pre-existing site 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 results indicated that constituent concentrations in the 7 confirmation soil samples collected from the former AST, SEP, and PWV locations, were in compliance with ECMC Table 915-1 standards, with exception to the pH results for samples AST1-B02@3", SEP1-B01@3', SEP1-B02@3", and PW1-B02@4'. However, the pH results were within the acceptable range of analytical variability, and these results alone do not indicate that a hydrocarbon release occurred at the former production facility location. As a result, this material was determined to be acceptable to leave in-place. Hydrocarbon impacted soil was not observed during field inspection and soil screening activities at the former production facility infrastructure locations. Groundwater was not encountered during facility decommissioning activities. Water visible in the attached photo log is due to rainwater/surface runoff collecting at the surface and within the excavation areas, above the tank battery secondary containment liner, which was verified to be intact, and not groundwater. Subsequent soil sampling was conducted below the tank battery following its removal on August 17, 2023, and groundwater was not encountered during these activities. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ 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.

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 NFA 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 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: \$ 0

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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? 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? 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 ECMC 1000 Series Reclamation Rules. Timeliness of reclamation initiation and completion will be subject to NFA, surface owner discretion and land use, and suitable ground conditions which allow for execution of surface reclamation activities so as to not cause unwarranted damages.

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? Yes

If YES, does the seed mix comply with local soil conservation district recommendations? Yes

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 07/31/2024

Proposed date of completion of Reclamation. 08/31/2024

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. 03/13/2023

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/05/2023

Proposed site investigation commencement. 07/05/2023

Proposed completion of site investigation. 08/17/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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

Laboratory results indicated that constituent concentrations in the 7 confirmation soil samples collected from the former AST, SEP, and PWV locations, were in compliance with ECMC Table 915-1 standards, with exception to the pH results for samples AST1-B02@3", SEP1-B01@3', SEP1-B02@3", and PW1-B02@4'. However, the pH results were within the acceptable range of analytical variability, and these results alone do not indicate that a hydrocarbon release occurred at the former AST, SEP, and PWV locations. As a result, this material was determined to be acceptable to leave in-place. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. As such, 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 Lead

Submit Date: 10/03/2023

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: Taylor Robinson

Date: 11/06/2023

Remediation Project Number: 28990

COA Type**Description**

	<p>Based on the information presented, the elevated pH sample from the spill area appears to be within the range of background pH and there is no indication of a spill; therefore, elevated pH may not be associated with E&P activities. It appears that no further remedial action is necessary at this time and the ECMC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or background levels or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</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**

403545246	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403545512	ANALYTICAL RESULTS
403545514	SITE MAP
403546510	PHOTO DOCUMENTATION
403546523	SOIL SAMPLE LOCATION MAP
403546524	ANALYTICAL RESULTS
403585794	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)