

State of Colorado
Energy & Carbon Management Commission

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05/29/2024

Report taken by:

Kari Brown

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 4121 Initial Form 27 Document #: 1981125

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: 317685	API #: _____	County Name: WELD
Facility Name: UPRR 43 PAN AM B-61N68W 3NESW	Latitude: 40.078437	Longitude: -104.991876	
	** correct Lat/Long if needed: Latitude: 40.080505	Longitude: -104.989347	
QtrQtr: NESW	Sec: 3	Twp: 1N	Range: 6W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Agriculture and Irrigation Ditch

Is domestic water well within 1/4 mile? No 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

Surface water (irrigation ditch) approximately 50 feet (ft) northeast, building approximately 330 ft north. Depth to groundwater has not been determined.

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	SOILS	190' N-S x 160' E-W x 12 ft 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.

On July 21, 2007, a produced water release occurred at the UPRR 43 Pan Am B 1 Salt Water Disposal facility when a loose fitting in the control room released 15 barrels (bbls) of produced water within the tank battery berm. The petroleum hydrocarbon impacted soil was excavated. A Form 27 (Document No. 1981125) was submitted to the Colorado Oil and Gas Conservation Commission (COGCC) in January 2008 regarding this release.

Since the July 2007 release, there have been three subsequent releases at the site. Twelve bbls of produced water were released inside the tank berm on January 1, 2009, 47 bbls of oil were released inside the tank berm on July 15, 2009, and 22 bbls of produced water were released inside the tank berm on November 23, 2010. In each instance, produced water was recovered at the surface and soil exceeding the ECMC allowable levels for total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), and/or specific conductance (EC) was left in place at the conclusion of the limited excavation and assessment activities with the understanding that additional soil removal would be completed upon decommissioning of the facility.

A third-party release was reported on January 24, 2024. Oxy personnel are in contact with the third-party associates and discussions regarding soil impacts at the location are currently underway. Partially abandoned third-party flowlines remain on the location and photographic documentation is provided in Attachment D.

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):

Please refer to the Soil Sampling Summary Attachment.

Proposed Groundwater Sampling

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

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 105

Number of soil samples exceeding 915-1 39

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

Approximate areal extent (square feet) 22300

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

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.

NA / ND

-- Highest concentration of TPH (mg/kg) 10500

-- Highest concentration of SAR 13

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 11

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)

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☐ 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?

Please refer to the Soil Sampling Summary Attachment.

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 5,700 cubic yards of petroleum hydrocarbon impacted soil were removed from the 2012 excavation and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. Groundwater was not encountered in the excavations. Based on assessment activities, impacted soil remains in place. Further assessment activities are being considered. The excavation locations and estimated extent of impacted soil in place is depicted on the Site Assessment Map attached as Figure 1.

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.

Petroleum hydrocarbon impacted soil was excavated in January and February 2012. Additional remedial options will be assessed following completion of assessment activities and evaluation of the third-party release and associated remediation activities.

Soil Remediation Summary

☒ In Situ

☒ Ex Situ

<input type="checkbox"/> Bioremediation (or enhanced bioremediation)	Yes	Excavate and offsite disposal
<input type="checkbox"/> Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) <input type="text" value="5700"/>
<input type="checkbox"/> Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or ECMC Facility ID # <input type="text" value="149007"/>
Yes <input type="checkbox"/> Natural Attenuation	No	Excavate and onsite remediation
<input type="checkbox"/> Other <input type="text"/>		<input type="checkbox"/> Land Treatment
		<input type="checkbox"/> Bioremediation (or enhanced bioremediation)
		<input type="checkbox"/> Chemical oxidation
		<input type="checkbox"/> Other <input type="text"/>

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 Soil Assessment and Remediation

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: \$ 50000

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 5700

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

ECMC Disposal Facility ID #, if applicable: 149007

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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? Yes

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 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 Kerr-McGee tank battery was decommissioned. The site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules. Timelines 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? _____

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. 07/21/2007

Actual Spill or Release date, or date of discovery. 07/21/2007

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/21/2007

Proposed site investigation commencement. 07/21/2007

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/21/2007

Proposed date of completion of Remediation. 12/31/2025

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

Oxy personnel are in contact with the third-party associates and discussions regarding soil impacts at the location are currently underway. Partially abandoned third-party flowlines remain on the location.

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

Signed: Phillip Hamlin

Title: Senior Environmental Rep

Submit Date: 05/29/2024

Email: Phillip_Hamlin@oxy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Kari Brown

Date: 07/24/2024

Remediation Project Number: 4121

COA Type**Description**

	In accordance with 913.d.(1), Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.
	On the next quarterly (90 days) Form 27 Supplemental Operator will provide an updated timeline to begin remediation based on soil and groundwater analytical data and discussion with 3rd party associates
2 COAs	

ATTACHMENT 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**

403792599	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403792603	ANALYTICAL RESULTS
403792604	OTHER
403792607	ANALYTICAL RESULTS
403792608	SITE MAP
403792618	IMPLEMENTATION SCHEDULE
403807349	PHOTO DOCUMENTATION
403864407	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)