

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

403941703

Receive Date:

10/08/2024

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 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: Phil Hamlin	Email: Phillip_Hamlin@oxy.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9106 Initial Form 27 Document #: 2143456

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: SPILL OR RELEASE	Facility ID: 439681	API #: _____	County Name: WELD
Facility Name: SPILL/RELEASE POINT	Latitude: 40.040113	Longitude: -104.872339	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 22	Twp: 1N	Range: 6W Meridian: 6 Sensitive Area? Yes

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

Retention ponds located approximately 940 feet (ft) southeast and 1,000 ft west; A creek located approximately 1,080 ft southeast; Domestic water well located approximately 1,110 ft east; Multiple buildings and livestock holding pens located within ¼ mile; Groundwater at approximately 6 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 sampling and laboratory analysis
Yes	SOILS	58' (E-W) x 40' (N-S) x 10' bgs	Excavation, soil sampling, and laboratory 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 October 30, 2014, historical impacts were discovered during tank battery reconstruction activities at the Albert Sack Unit 1 production facility, and excavation activities were initiated. Groundwater was encountered in the excavation area at approximately 10 feet below ground surface (bgs). The ECMC issued Spill/Release Point ID 439681 for this release.

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):

Soil samples were collected as described in the Initial Form 27 (Document No. 2143456), and a previous Form 27-Supplemental update (Document No. 401563094). Based on the data presented, impacted soils in the excavation area were remediated to be in full compliance with the ECMC standards at the time of excavation.

Proposed Groundwater Sampling

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

Between April 2, 2015 and June 7, 2021, a total of fifty-one (51) groundwater monitoring wells were installed to further assess the extent of groundwater impacts and for remediation purposes. All monitoring wells, with the exception of BH05R2 and BH16, were temporarily abandoned for spring agricultural and seeding considerations during the First Quarter 2021, and were replaced prior to the Second Quarter 2021 monitoring event. Quarterly groundwater monitoring was initiated on April 14, 2015 and is ongoing at existing monitoring wells BH01R3, BH02R4, BH05R2, BH08R3, BH09R3, BH10R4, BH11R4, BH12R3 - BH15R3, and BH16. Groundwater analytical data is presented in Table 1, and the groundwater sample locations are illustrated on Figure 1.

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 15

Number of soil samples exceeding 915-1 5

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

Approximate areal extent (square feet) 1020

NA / ND

-- Highest concentration of TPH (mg/kg) 1908

NA Highest concentration of SAR

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 374

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 6

Number of groundwater monitoring wells installed 51

Number of groundwater samples exceeding 915-1 104

-- Highest concentration of Benzene (µg/l) 7740

-- Highest concentration of Toluene (µg/l) 1400

-- Highest concentration of Ethylbenzene (µg/l) 1300

-- Highest concentration of Xylene (µg/l) 9310

NA Highest concentration of Methane (mg/l)

Surface Water

0 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?

Hydrocarbon-impacted groundwater has historically been detected in off-site groundwater monitoring wells BH09, BH09R, BH09R2, BH09R3, BH11R, and BH11R3.

☐ 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.

Between October 30 and November 14, 2014, approximately 500 cubic yards of impacted material were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal. Approximately 80 barrels of impacted groundwater were removed from the excavation area via vacuum truck and transported to a licensed disposal facility.

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.

Laboratory data indicate that impacted soil in the excavation area have been remediated to be in full compliance with the ECMC standards at the time of sampling. Prior to backfilling, approximately 264 pounds of OxPure® activated carbon were added to the excavation to mitigate remaining hydrocarbon impacts in groundwater. Air sparge / enhanced fluid recovery (AS/EFR) were selected as remedial technologies to address remaining soil and groundwater impacts. Bi-weekly mobile AS/EFR events were conducted at the site between October 19, 2016 and January 26, 2018, under an approved United States Environmental Protection Agency (USEPA) Underground Injection Control (UIC) permit application. A total of approximately 233 barrels of impacted groundwater were removed during AS/EFR activities. In January 2018, quarterly groundwater monitoring and AS/EFR events were suspended, pending the construction of a well pad and production facility at this location. Tank battery reconstruction activities were completed in February 2019 and replacement monitoring wells were subsequently installed.

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) _____ 500
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
_____ Natural Attenuation	No _____ Excavate and onsite remediation
_____ Other _____	_____ Land Treatment
	_____ Bioremediation (or enhanced bioremediation)
	_____ Chemical oxidation
	_____ Other _____

Groundwater Remediation Summary

_____ No	_____ Bioremediation (or enhanced bioremediation)
_____ No	_____ Chemical oxidation
_____ Yes	_____ Air sparge / Soil vapor extraction
_____ Yes	_____ Natural Attenuation
_____ Yes	_____ Other _____ Groundwater removal, OxPure® activated carbon application, enhanced fluid recovery

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.

The monitoring wells BH01R3, BH02R4, BH05R2, BH08R3, BH09R3, BH10R4, BH11R4, BH12R3 through BH15R3, and BH16 are sampled on a quarterly basis for laboratory analysis of full list Table 915-1 constituents in groundwater. Cross-gradient and historically compliant groundwater monitoring well BH16 was selected as a background location for comparison to inorganic groundwater standards in Table 915-1. Based on a comparison to site-specific background concentrations, point of compliance (POC) well BH01R3 exceeded the allowable level for sulfate; however, the result was anomalously high as compared to historical results and, therefore, step-out wells are not recommended at this time. Kerr-McGee will continue to evaluate POC on a quarterly basis. The current and former monitoring well locations are depicted on Figure 1, and a groundwater elevation contour map using the September 2024 monitoring data is presented as Figure 2. The laboratory analytical reports for the December 2023, March 2024, June 2024, and September 2024 sampling events are attached.

Quarterly groundwater monitoring will continue 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: \$ 80000

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:

NA

Volume of E&P Waste (solid) in cubic yards 500

E&P waste (solid) description Impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Front Range Landfill - Erie, Colorado

Volume of E&P Waste (liquid) in barrels 313

E&P waste (liquid) description Impacted groundwater

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Licensed 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 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 site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules.

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. _____

Actual Spill or Release date, or date of discovery. 10/30/2014

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/30/2014

Proposed site investigation commencement. 10/30/2014

Proposed completion of site investigation. 06/07/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/30/2014

Proposed date of completion of Remediation. 12/31/2027

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: 10/08/2024

Email: Phillip_Hamlin@oxy.com

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

ECMC Approved: Alexander Ahmadian

Date: 12/31/2024

Remediation Project Number: 9106

COA Type**Description**

	In accordance with Rule 914, additional monitoring wells are required cross gradient of BH02R4 to define the horizontal extent of impacts to groundwater. More than one well may be required to obtain a point of compliance. The monitoring well(s) shall be installed within 45 days. If impacts are observed during monitoring well installation a step out monitoring well(s) shall be installed to define the horizontal extent of impacts to soil and groundwater and the monitoring wells shall be installed within 45 days of observations.
1 COA	

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**

403941703	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403943794	ANALYTICAL RESULTS
403943796	ANALYTICAL RESULTS
403943799	ANALYTICAL RESULTS
403943800	ANALYTICAL RESULTS
403943802	ANALYTICAL RESULTS
403945744	GROUND WATER ELEVATION MAP
403945745	SITE MAP
404044423	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)