

State of Colorado
Oil and Gas Conservation Commission

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received 11/11/2015
Project 9392
Remediation 200438221
Spill 439297
Document #: 2210558

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

☐ Spill or Release ☐ Plug & Abandon ☐ Central Facility Closure ☐ Site/Facility Closure ☒ Other (describe): NFA

OGCC Employee:

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV

Tracking No:

GENERAL INFORMATION

OGCC Operator Number: 47120		Contact Name and Telephone	
Name of Operator: Kerr-McGee Oil and Gas Onshore, LP		Name: Phillip Hamlin	
Address: 1099 18th Street, Suite 1800		No: 970-336-3500	
City: Denver State: CO Zip: 80202		Fax: 970-336-3656	
API/Facility No: 439297		County: Weld	
Facility Name: UPRR 42 Pan Am Gas Unit X		Facility Number: 63N66W31SWNE	
Well Name: UPRR 42 Pan Am Gas Unit X		Well Number: 1	
Location (Qtr, Sec, Twp, Rng, Meridian): SWNE S31 T3N R66W		Latitude: 40.184270 Longitude: -104.815320	

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc.): Condensate and Produced Water	
Site Conditions: Is location within a sensitive area (according to Rule 901e)? <input checked="" type="checkbox"/> Y <input type="checkbox"/> N If yes, attach evaluation.	
Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): Non-Crop Land	
Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Fine Sand	
Potential receptors (water wells within 1/4 mi, surface waters, etc.): The nearest surface water is located approximately 125' west of the site. The nearest water well is located approximately 1100' north of the release area.	
Description of Impact (if previously provided, refer to that form or document):	
Impacted Media (check):	Extent of Impact:
<input checked="" type="checkbox"/> Soils	60' (E-W) x 55' (N-S) x 4' bgs
<input type="checkbox"/> Vegetation	
<input checked="" type="checkbox"/> Groundwater	See attached data
<input type="checkbox"/> Surface water	
How Determined:	
Excavation, soil sampling, and laboratory analysis	
Groundwater sampling and laboratory analysis	

REMEDIALATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document): <p>On October 2, 2014, a flowline release was discovered during maintenance activities at the UPRR 42 Pan Am Gas Unit X 1 production facility. The volume of released material is unknown. The well was shut in, associated underground infrastructure repaired, and excavation activities commenced. Groundwater was encountered in the excavation at approximately 4 feet below ground surface (bgs). An Initial / Supplemental Form 19 was submitted on October 10, 2014. The COGCC has issued Spill Tracking number 439297 for this release.</p>
Describe how source is to be removed: <p>On October 2, 2014, excavation activities commenced and approximately 180 cubic yards of impacted material were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for disposal. Excavation activities were guided in the field using a photoionization detector (PID) to measure volatile organic compound (VOC) concentrations in soil. Soil samples were collected from the sidewalls of the final extent of the excavation area at approximately 2 feet bgs. Soil samples were submitted to Origins Laboratory in Denver, Colorado for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by USEPA Method 8260, TPH - diesel range organics and oil range organics (DRO and ORO) by USEPA Method 8015. Laboratory results indicated that constituent concentrations in the soil samples collected from the final lateral extent of the excavation area were below the applicable COGCC Table 910-1 standards. Soils were excavated into the phreatic zone to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. Groundwater was encountered in the excavation at approximately 4 feet bgs. A groundwater sample (GW01) was collected and submitted for laboratory analysis of BTEX. Analytical results received on October 2, 2014, indicated that the benzene concentration in sample GW01 was above the applicable COGCC Table 910-1 groundwater standard. Approximately 10 barrels of impacted groundwater were removed via vacuum truck and transported to a licensed injection facility for disposal. A second groundwater sample (GW02) was subsequently collected from the excavation area and submitted for laboratory analysis of BTEX. Analytical results received on October 6, 2014, indicated that constituent concentrations in sample GW02 were below applicable COGCC Table 910-1 groundwater standards. Soil analytical results are summarized in Table 1 and groundwater analytical results are summarized in Table 2. Soil and excavation groundwater sample locations are illustrated on Figure 1 and laboratory analytical reports are included as Attachment A.</p>
Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.: <p>Impacted soil was excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. Impacted groundwater was removed via a vacuum truck and transported to a licensed injection facility for disposal. Prior to backfilling the excavation, 260 pounds of activated carbon were added to the groundwater table to mitigate remaining hydrocarbon impacts. Additional groundwater monitoring and remediation measures are described on the following page.</p> <p>Submit Page 2 with Page 1.</p>

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Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No.: _____

REMEDATION WORKPLAN (CONT.)

OGCC Employee: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

On May 27, 2015, three temporary groundwater monitoring/remediation wells (BH01-BH03) were installed at the site to further assess the extent of groundwater impacts. Groundwater samples were collected from the temporary monitoring wells on May 29, 2015. Samples were submitted to Origins Laboratory in Denver, Colorado for analysis of BTEX by USEPA Method 8260. Temporary monitoring/remediation well locations and groundwater analytical results are illustrated on Figure 2, and a groundwater contour map is presented on Figure 3. Groundwater analytical results are summarized in Table 2 and the groundwater laboratory analytical reports and well completion diagrams are included as Attachments A and B, respectively. Based on these data, Kerr-McGee is requesting a no further action (NFA) determination for this release.

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. Use additional sheet for description if required.

The excavation has been backfilled with clean soil and graded to match the adjacent topography. Kerr-McGee's tank battery remains at the site. Reclamation activities at the site will be compliant with COGCC regulations.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? ☐ Y ☒ N If yes, describe:

Data indicate that impacted soil has been delineated and removed from the site. Temporary monitoring/remediation wells have been installed to further assess groundwater impacts; groundwater points of compliance have been achieved. Soil and groundwater analytical results are summarized in Tables 1 and 2, respectively. The analytical laboratory reports are included as Attachment A. Based on the soil and groundwater analytical data, Kerr-McGee is requesting an NFA determination for this release.

Final disposition of E&P waste (land treated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

Impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for disposal. Impacted groundwater was transported to a licensed injection facility for disposal.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: 10/2/2014	Date Site Investigation Completed: 5/27/2015	Remediation Plan Submitted: _____
Remediation Start Date: 10/2/2014	Anticipated Completion Date: _____	Actual Completion Date: 5/29/15

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

Print Name: Phillip Hamlin

Signed: [Signature] Title: Senior HSE Representative Date: 11/6/15
OGCC Approved: _____ Title: _____ Date: _____

request for no further actions not approved at this time. see COA attached for further sampling requirements before NFA request can be evaluated.

At a minimum, two more rounds of sampling and analysis groundwater monitoring points within the outline of the original 3 monitoring points (2015). Groundwater sampling and analysis for benzene, toluene ethylbenzene and xylene isomers with data submission to COGCC are required before a request for closure. Sampling events should be no closer than 90 days apart.