

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
401307569  
Receive Date:  
07/23/2018

Report taken by:  
PETER GINTAUTAS

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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATON

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) 336-3500</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Phillip Hamlin</u>	Email: <u>Phil.Hamlin@anadarko.com</u>	Mobile: <u>(970) 515-1161</u>

PROJECT, PURPOSE & SITE INFORMATION

**PROJECT INFORMATION**  
Remediation Project #: 9147 Initial Form 27 Document #: 2314935

**PURPOSE INFORMATION**

<input type="checkbox"/> 901.e. Sensitive Area Determination	<input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
<input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure	<input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
<input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation	<input checked="" type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project
<input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste	<input type="checkbox"/> Rule 906.c.: Director request
<input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure	<input type="checkbox"/> Other _____

**SITE INFORMATION** N Multiple Facilites ( in accordance with Rule 909.c. )

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>441436</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.172282</u>	Longitude: <u>-104.874173</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>3</u>	Twp: <u>2N</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**

An occupied building is located approximately 550 feet north of the release location.

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             | _____                                  |
| <input type="checkbox"/> Oil                       | <input type="checkbox"/> Tank Bottoms                |  |
| <input checked="" type="checkbox"/> Condensate     | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> 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	39' (N-S) x 30' (E-W) x 3' 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 March 31, 2015, historical impacts were discovered adjacent to the Richardson V 3-2 wellhead during abandonment activities. The well was shut in, associated underground infrastructure removed, and excavation activities were initiated. Groundwater was encountered in the excavation at approximately 3 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 441436 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. Based on the data presented, impacted soils in the excavation area were remediated to be in full compliance with State standards. Soil sample analytical data is presented in Table 1, and soil sample locations are illustrated on Figure 1.

### Proposed Groundwater Sampling

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

Groundwater samples were collected as described herein. Based on the data presented, hydrocarbon impacts to groundwater were remediated to be in full compliance with State standards. Groundwater analytical data is presented in Table 2. The excavation groundwater sample location is illustrated on Figure 1, and the temporary groundwater monitoring well locations are illustrated on Figure 2. The laboratory analytical reports are included as Attachment A.

### 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 9  
Number of soil samples exceeding 910-1 5  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 1170

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
NA Highest concentration of SAR \_\_\_\_\_  
BTEX > 910-1 No  
Vertical Extent > 910-1 (in feet) 3

### Groundwater

Number of groundwater samples collected 37  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 5'  
Number of groundwater monitoring wells installed 5  
Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 1740  
-- Highest concentration of Toluene (µg/l) 7470  
-- Highest concentration of Ethylbenzene (µg/l) 494  
-- Highest concentration of Xylene (µg/l) 6660  
NA Highest concentration of Methane (mg/l) \_\_\_\_\_

### Surface Water

0 Number of surface water samples collected  
0 Number of surface water samples exceeding 910-1  
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?

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 March 31 and April 8, 2015, approximately 110 cubic yards of impacted soil were excavated and transported to the Front Range Regional Landfill in Erie, Colorado for disposal. Laboratory analytical results indicated that constituent concentrations in the soil samples collected from the final lateral extent of the excavation area were in full compliance with State 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 3 feet bgs. A groundwater sample (GW01) was collected from the excavation following the removal of approximately 50 barrels of groundwater, and submitted for laboratory analysis of BTEX. Groundwater analytical results received on April 1, 2015, indicated that the benzene, toluene, and total xylenes concentrations in sample GW01 were out of compliance with State standards. A second groundwater sample (GW02) was collected from the excavation following the removal of approximately 50 additional barrels of groundwater, and submitted for laboratory analysis of BTEX. Analytical results received on April 10, 2015, indicated that the benzene, toluene, and total xylenes concentrations in sample GW02 remained out of compliance with State standards.

## 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.

Prior to backfilling, approximately 50 pounds of activated carbon were added to the groundwater within the excavation area to mitigate remaining hydrocarbon impacts in groundwater. Based on the analytical data presented herein, remediation is complete at this site and Kerr-McGee is requesting a No Further Action (NFA) determination for this release.

## Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation ( or enhanced bioremediation )	Yes	Excavate and offsite disposal
_____ Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) _____ 110
_____ Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or COGCC 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

No \_\_\_\_\_ Air sparge / Soil vapor extraction

Yes \_\_\_\_\_ Natural Attenuation

Yes \_\_\_\_\_ Other \_\_\_\_\_ Activated carbon adsorption

## 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.

Between February 16, 2016 and March 27, 2017, five (5) temporary groundwater monitoring wells (BH01 - BH05) were installed at the site to assess the extent of groundwater impacts. However, due to landowner constraints, the 5 temporary monitoring wells were abandoned prior to the Fourth Quarter 2017 sampling event. Groundwater monitoring activities were continued at 5 temporary grab sampling points (BH01R - BH05R) that were installed via hand auger in the locations of the initial 5 temporary monitoring wells each quarter, sampled, and abandoned the same day. Groundwater samples were collected on a quarterly basis and submitted for laboratory analysis of BTEX. Analytical results for the groundwater samples collected from the temporary monitoring wells and temporary grab sampling points indicated that constituent concentrations were in full compliance with State standards for a minimum of four consecutive quarters. Temporary monitoring well and temporary grab groundwater sample locations are illustrated on Figure 2, and quarterly groundwater contour maps for the Second Quarter 2016 through First Quarter 2017 are presented on Figures 3, 4, 5, and 6. Groundwater contour maps for subsequent sampling events are not included, as the temporary grab groundwater sampling points were not surveyed. Well completion logs for the initial temporary monitoring wells (BH01 - BH05) are included as Attachment B.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:**  Quarterly  Semi-Annually  Annually  Other Final Report

**Report Type:**  Groundwater Monitoring  Land Treatment Progress Report  O&M Report

Other NFA Request

### 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 110

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Front Range Regional Landfill - Erie, Colorado

Volume of E&P Waste (liquid) in barrels 100

E&P waste (liquid) description Hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Licensed disposal facility

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

## 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 has been restored to its pre-release grade. Kerr-McGee will consult with the surface owner to determine reclamation specifics to properly conduct reclamation activities in accordance with COGCC 1000 Series 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 approve the seed mix? \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### **PRIOR DATES**

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, if known. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 03/31/2015

Date of commencement of Site Investigation. 03/31/2015

Date of completion of Site Investigation. 03/27/2017

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 03/31/2015

Date of completion of Remediation. 06/28/2018

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

As described, laboratory analytical data for the soil samples collected from the final lateral extent of the excavation were in full compliance with State standards. Laboratory analytical data for the groundwater samples collected from the temporary monitoring wells (BH01 - BH01) and temporary grab sampling points (BH01R - BH05R) indicated that constituent concentrations were in full compliance with State standards for a minimum of four consecutive quarters. Soil analytical results are summarized in Table 1, and groundwater analytical results are summarized in Table 2. Excavation soil and groundwater sample locations are illustrated on Figure 1, temporary groundwater monitoring well and temporary grab groundwater sample locations are illustrated on Figure 2, and quarterly groundwater contour maps are presented on Figures 3, 4, 5, and 6. The laboratory analytical reports are included as Attachment A, and well completion logs for the initial temporary monitoring wells (BH01 - BH05) are included as Attachment B. Based on the remediation activities completed at the site and the analytical results presented herein, Kerr-McGee is requesting a No Further Action (NFA) determination for this release.

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 HSE Representative \_\_\_\_\_

Submit Date: 07/23/2018 \_\_\_\_\_

Email: Phil.Hamlin@anadarko.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: PETER GINTAUTAS \_\_\_\_\_

Date: 07/24/2018 \_\_\_\_\_

Remediation Project Number: 9147 \_\_\_\_\_

**COA Type****Description**

	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or further remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
--	---

**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**

401307569	FORM 27-SUPPLEMENTAL-SUBMITTED
401700204	SOIL SAMPLE LOCATION MAP
401700206	GROUND WATER ELEVATION MAP
401700212	ANALYTICAL RESULTS
401700216	ANALYTICAL RESULTS
401708471	GROUND WATER SAMPLE LOCATION
401708485	ANALYTICAL RESULTS
401708503	LOGS

Total Attach: 8 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)