

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:
401669562
Receive Date:
09/14/2018

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 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>
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 #: 9608 Initial Form 27 Document #: 200439352

PURPOSE INFORMATION

<input type="checkbox"/> 901.e. Sensitive Area Determination	<input checked="" type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
<input checked="" 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 checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation	<input 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 checked="" type="checkbox"/> Other <u>Transmittal of USEPA UIC Class V Rule Authorization for AS/EFR activities</u>

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

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>444846</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.091582</u>	Longitude: <u>-104.924528</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>31</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 CL Most Sensitive Adjacent Land Use Non-crop land

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

An occupied building is located approximately 125 feet southwest 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 checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input 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	24' (E-W) x 26' (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 February 12, 2016, historical hydrocarbon impacts were discovered along the partially-buried produced water vessel dumpline during construction activities at the HSR-Grant Brothers 10-31 production facility. The facility was shut in, associated infrastructure removed, and excavation activities were initiated. Groundwater was encountered in the excavation at approximately 10 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 444846 for this release. A partially-buried produced water vessel was removed and replaced during excavation activities.

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 were remediated to be in full compliance with State standards.

Proposed Groundwater Sampling

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

Groundwater samples are collected from the eight (8) temporary monitoring wells on a quarterly basis and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX).

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):

A partially-buried produced water vessel was removed and replaced during excavation activities.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 4
Number of soil samples exceeding 910-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 624

NA / ND

-- Highest concentration of TPH (mg/kg) 169.4
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 56
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 6'
Number of groundwater monitoring wells installed 8
Number of groundwater samples exceeding 910-1 11

-- Highest concentration of Benzene (µg/l) 1500
ND Highest concentration of Toluene (µg/l)
-- Highest concentration of Ethylbenzene (µg/l) 438
-- Highest concentration of Xylene (µg/l) 676
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?

Hydrocarbon impacted groundwater remains at the site. The 8 temporary groundwater monitoring wells will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with State standards for four consecutive quarters. Additional temporary groundwater monitoring wells may be installed, as necessary, to maintain point-of-compliance (POC).

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Between February 12 and 16, 2016, approximately 500 cubic yards of impacted soil were excavated and transported to the Front Range Regional 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 soils in the excavation area have been remediated to be in full compliance with State standards. Prior to backfilling, approximately 110 pounds of activated carbon were added to the groundwater within the excavation area to mitigate remaining hydrocarbon impacts in groundwater. Quarterly groundwater monitoring is ongoing and will be continued until concentrations remain in full compliance with State standards for four consecutive quarters. Kerr-McGee has selected air sparge (AS) and enhanced fluid recovery (EFR) as the remedial technologies to address remaining groundwater impacts at the site. Bi-weekly mobile AS/EFR events will be initiated; AS/EFR operational details are provided in the approved USEPA Underground Injection Control (UIC) permit, which is attached to this form. Estimated time to attain NFA is TBD based on the review of groundwater concentrations, the extent of impacted groundwater, and the efficacy of the selected remedial technologies.

Soil Remediation Summary

In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

Ex Situ

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 500
Name of Licensed Disposal Facility or COGCC Facility ID # _____
No _____ Excavate and onsite remediation
_____ 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, activated carbon adsorption, 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 8 temporary monitoring wells will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with State standards for four consecutive quarters.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Transmittal of approved USEPA UIC Class V Rule Authorization for AS/EFR activities

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

Other Transmittal of approved USEPA UIC Class V Rule Authorization for AS/EFR activities

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 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 80

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? No

Do all soils meet Table 910-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

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? _____

Is additional groundwater monitoring to be conducted? _____

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's production infrastructure has been rebuilt and remains on-site.

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. 02/15/2016

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/12/2016

Date of commencement of Site Investigation. 02/12/2016

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/12/2016

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

This Supplemental Form 27 is being prepared for the purpose of transmitting the approved USEPA UIC Permit Application to the COGCC. As such, no additional groundwater monitoring results or analytical data are included herein.

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: 09/14/2018

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: 09/14/2018

Remediation Project Number: 9608

COA Type

Description

<u>COA Type</u>	<u>Description</u>

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

<u>Att Doc Num</u>	<u>Name</u>
401669562	FORM 27-SUPPLEMENTAL-SUBMITTED
401669659	OTHER

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
	Submit reports of site investigation and progress of remediation including results of sampling and analysis on an annual basis or more often until remediation is closed.	09/14/2018

Total: 1 comment(s)