

**State of Colorado**  
**Oil and Gas Conservation Commission**

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Report taken by:

CHRIS CANFIELD

## 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 &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b> Phone: <u>(720) 929-6000</u> Mobile: <u>(720) 929-4306</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u> Zip: <u>80217-3779</u>	
Contact Person: <u>Erik Mickelson</u>	Email: <u>Erik.Mickelson@anadarko.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9828 Initial Form 27 Document #: 2526907

#### 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 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 type="checkbox"/> Other _____   |

#### SITE INFORMATION

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

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>444878</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>40.016982</u>	Longitude: <u>-104.955940</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWSW</u>	Sec: <u>25</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Non-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 1,285 feet southwest of the release location.

## 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
	GROUNDWATER	See Attached Data	Groundwater sampling and laboratory analysis
	SOILS	66' (E-W) x 57' (N-S) x 20' 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 13, 2016, a dump line release was discovered by an operator during routine activities at the UPRC-61N68W/25NWSW production facility. The facility was shut in, affected infrastructure removed, and excavation activities were initiated. Groundwater was encountered in the excavation area at approximately 20 feet below ground surface (bgs). The COGCC has issued Spill/Release Point ID 444878 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 COGCC standards.

#### Proposed Groundwater Sampling

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

Between June 1, 2016 and April 12, 2017, twelve (12) temporary monitoring wells (BH01 - BH12) were installed to further assess the extent of groundwater impacts and/or for remediation purposes. Quarterly groundwater sampling was initiated on June 1, 2016, and is ongoing. Groundwater samples are collected from the temporary monitoring wells on a quarterly basis and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX). Groundwater analytical data is presented in Table 1, and the groundwater sample locations are illustrated on Figure 1. Laboratory analytical reports are provided 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 20

Number of soil samples exceeding 910-1 4

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

Approximate areal extent (square feet) 3760

### NA / ND

-- Highest concentration of TPH (mg/kg) 491

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 20

### Groundwater

Number of groundwater samples collected 113

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 18'

Number of groundwater monitoring wells installed 12

Number of groundwater samples exceeding 910-1 30

-- Highest concentration of Benzene (µg/l) 15300  
0

-- Highest concentration of Toluene (µg/l) 10900  
00

-- Highest concentration of Ethylbenzene (µg/l) 14000  
0

-- Highest concentration of Xylene (µg/l) 22600  
00

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?

Impacted groundwater has historically been detected in off-site temporary groundwater monitoring wells BH05, BH07, BH08, and BH09.

☐ 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 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 COGCC standards for four consecutive quarters.

# 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 22 and May 13, 2016, approximately 2,350 cubic yards of impacted material were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal.

## 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 COGCC standards. On June 13, 2016, bi-weekly light non-aqueous phase liquid (LNAPL) gauging and removal activities were initiated at well BH01, and are currently ongoing. Quarterly groundwater monitoring is ongoing and will be continued until concentrations remain in full compliance with COGCC standards for four consecutive quarters. Additional remedial activities, including in-situ and ex-situ technologies, are currently under evaluation to address remaining groundwater impacts at the site. Estimated time to attain NFA is TBD based on the 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) 2350  
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  
No Air sparge / Soil vapor extraction  
Yes Natural Attenuation  
Yes Other LNAPL 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.

Between June 1, 2016 and March 29, 2017, 12 temporary groundwater monitoring wells (BH01 - BH12) were installed at the site to further assess the extent of groundwater impacts and/or for remediation purposes. Wells BH02 and BH04 were removed from the quarterly sampling program following the Third Quarter 2018 event, as described in the previous Form 27-Supplemental Annual Update. However, these wells were inadvertently sampled during the Fourth Quarter 2018 and First Quarter 2019 monitoring events. Going forward, wells BH02 and BH04 will be omitted from ongoing quarterly groundwater monitoring events at the site. The remaining ten (10) temporary monitoring wells (BH01, BH03, and BH05 - BH12) will continue to be sampled on a quarterly basis and submitted for laboratory analysis of BTEX until concentrations remain in full compliance with COGCC standards for four consecutive quarters. Groundwater sample locations are illustrated on Figure 1, and a potentiometric surface contour map for the First Quarter 2019 is illustrated on Figure 2. Well completion logs for the temporary monitoring wells are included as Attachment B.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other \_\_\_\_\_

**Report Type:** ☒ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report  
☐ Other \_\_\_\_\_

### 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 2350

E&P waste (solid) description Hydrocarbon impacted soil

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

Non-COGCC Disposal Facility: Front Range Landfill - Erie, CO

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

E&P waste (liquid) description \_\_\_\_\_

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

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION 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 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. 02/13/2016

Actual Spill or Release date, if known. 02/13/2016

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/13/2016

Date of commencement of Site Investigation. 02/13/2016

Date of completion of Site Investigation.

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/22/2016

Date of completion of Remediation.

### SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

### OPERATOR COMMENT

The original Spill/Release Report incorrectly listed the quarter-quarter of the release location as the NWSW of Sec. 35-T1N-R68W. The correct quarter-quarter for this release location is the SESW of Sec. 35-T1N-R68W.

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

Signed: Erik Mickelson

Title: Senior HSE Representative

Submit Date: 03/19/2019

Email: Erik.Mickelson@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: CHRIS CANFIELD

Date: 04/01/2019

Remediation Project Number: 9828

### COA Type

### Description

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## 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

401949871	FORM 27-SUPPLEMENTAL-SUBMITTED
401950083	LOGS
401950159	GROUND WATER SAMPLE LOCATION
401950172	ANALYTICAL RESULTS
401950184	ANALYTICAL RESULTS
401950220	GROUND WATER ELEVATION MAP

Total Attach: 6 Files

## General Comments

### User Group

### Comment

### Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)