

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:
402252244
Receive Date:
12/18/2019

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 Phone: <u>(970) 336-3500</u> Mobile: <u>()</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		
Contact Person: <u>Phil Hamlin</u> Email: <u>Phil_Hamlin@oxy.com</u>		

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 5389 Initial Form 27 Document #: 2522794

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 Facilities (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>323422</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HUNT 27-5</u>	Latitude: <u>40.258960</u>	Longitude: <u>-104.794070</u>	
	** correct Lat/Long if needed: Latitude: <u>40.258743</u>	Longitude: <u>-104.792292</u>	
QtrQtr: <u>NENE</u>	Sec: <u>5</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agriculture

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

A water well and occupied building approximately 150 feet (ft) south, surface water approximately 1,300 ft west-southwest, and groundwater approximately 2 ft below ground surface (bgs).

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	Petroleum hydrocarbon impacted groundwater
Yes	SOILS	48ft N-S x 70ft E-W x 6ft bgs (max)	Petroleum hydrocarbon impacted soil

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

While upgrading the Kerr UPRR 41-5 #1 tank battery, historical petroleum hydrocarbon impacted soil was discovered. The volume of the release is unknown. The petroleum hydrocarbon impacted soil was excavated.

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):

Between February 17 and March 3, 2010, ten soil samples were collected from the excavation base and sidewalls and were submitted for laboratory analysis of total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Laboratory analytical results indicated that TPH and BTEX concentrations and levels were in full compliance with Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the lateral extent of the excavation. The excavation soil sample locations are depicted on Figure 1. The soil sample analytical results are summarized on Table 1.

Proposed Groundwater Sampling

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

On February 17, 2010, groundwater sample GW01 was collected from the excavation and submitted for laboratory analysis of BTEX. Laboratory analytical results indicated sample GW01 exceeded the COGCC Table 910-1 allowable level for benzene at a concentration of 65 micrograms per liter (µg/L). The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 2.

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 10
Number of soil samples exceeding 910-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 3360

NA / ND

-- Highest concentration of TPH (mg/kg) 2500
NA Highest concentration of SAR
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 4

Groundwater

Number of groundwater samples collected 298
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 2'
Number of groundwater monitoring wells installed 12
Number of groundwater samples exceeding 910-1 43

-- Highest concentration of Benzene (µg/l) 550
-- Highest concentration of Toluene (µg/l) 2.7
-- Highest concentration of Ethylbenzene (µg/l) 440
-- Highest concentration of Xylene (µg/l) 710
NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected
 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?

Petroleum hydrocarbon impacts to groundwater have been detected in samples collected from groundwater monitoring wells in the agricultural field northwest of the former excavation.

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? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 750 cubic yards of impacted soil were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. Approximately 1,420 barrels of impacted groundwater were removed from the excavation and transported to a licensed injection facility for disposal. The general site layout and excavation footprint are depicted on the Excavation Site Map provided as Figure 1.

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 the 2010 excavation, 10 gallons of MicroBlaze®, a concentrated solution of facultative microbes, nutrients, and surfactants designed to bioremediate petroleum hydrocarbons, were applied to the groundwater and exposed smear zone soils in the excavation.

As of the March 2018 quarterly monitoring event, the benzene concentration in monitoring well MW08 exceeded the COGCC Table 910-1 allowable level at 214 µg/L. Following the March 2018 quarterly monitoring event, Kerr-McGee Oil and Gas Onshore LP (Kerr-McGee) contracted LT Environmental, Inc. (LTE) to design and implement a biological amendment program and a carbon slurry injection program to remediate the residual dissolved-phase BTEX impacts to groundwater. Kerr-McGee submitted an Underground Injection Control (UIC) Permit Application to Region 8 of the United States Environmental Protection Agency (USEPA) on August 27, 2018, that was subsequently approved on September 18, 2018.

The carbon slurry injection program was implemented, as outlined in the UIC Permit Application, with the objective of reducing the residual dissolved-phase BTEX concentrations in the injection area surrounding MW08 to less than the COGCC Table 910-1 allowable levels. Between November 7 and 9, 2018, LTE oversaw the injection of approximately 800 pounds (dry weight) of BOS 200® that was mixed with potable water and cultured facultative microbes to form an injectable carbon slurry. The BOS 200® product is designed to enhance petroleum hydrocarbon degradation by capturing the dissolved-phase petroleum hydrocarbons in a carbon matrix and promoting microbial metabolism of the hydrocarbons under both aerobic and anaerobic conditions. The injection area is depicted on Figure 2.

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) _____ 750
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007
_____ Natural Attenuation	No _____ Excavate and onsite remediation
_____ Other _____	_____ Land Treatment
	_____ Bioremediation (or enhanced bioremediation)
	_____ Chemical oxidation
	_____ Other _____

Groundwater Remediation Summary

Yes _____	Bioremediation (or enhanced bioremediation)
No _____	Chemical oxidation
No _____	Air sparge / Soil vapor extraction
Yes _____	Natural Attenuation
Yes _____	Other Groundwater Removal and MicroBlaze® Application (2010); BOS 200® Injection (2018)

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 August 2010 and November 2015, ten groundwater monitoring wells (MW01 through MW10) and two replacement monitoring wells (MW03R and MW09R) were installed at the site. Groundwater monitoring continued on a quarterly basis. Monitoring wells MW02 and MW05 were removed from the groundwater monitoring program following approval by the COGCC in the letter dated May 25, 2012. The monitoring well locations are depicted on Figure 2. Boring logs with monitoring well completion diagrams are attached.

On November 13, 2013, monitoring wells MW01, MW02, MW04, MW05, MW06, MW07, MW08, and MW10 were surveyed to obtain the relative groundwater and top-of-casing well elevation data. The survey data indicated the groundwater flow direction at the site is to the northwest. On April 11, 2018 replacement monitoring wells MW03R and MW09R were tied into the survey data. The survey data indicated the groundwater flow direction at the site is to the northwest. Relative groundwater elevations are provided in Table 2. Groundwater Elevation Contour Maps for the fourth quarter 2019 through third quarter 2019 monitoring events are provided as Figures 3A through 3D, respectively.

As of the September 2019 quarterly monitoring event, BTEX concentrations in monitoring wells MW01, MW03R, MW04, MW06, MW07, MW09R, and MW10 were in full compliance with COGCC Table 910-1 allowable levels for four consecutive quarterly monitoring events. MW08 required sampling in early January of 2019 as a substitute representation for the 2018 fourth quarter, due to a blockage in the well during the final 2018 sampling event. The groundwater analytical results are summarized in Table 2. The analytical reports for the four compliant groundwater monitoring events are attached.

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 Status 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:

The petroleum hydrocarbon impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 750

E&P waste (solid) description Petroleum hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels 1420

E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater

COGCC Disposal Facility ID #, if applicable: 159255

Non-COGCC 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 was restored to its pre-release grade. The Kerr-McGee production facility remains at the 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. _____

Actual Spill or Release date, if known. 11/16/2010

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/17/2010

Date of commencement of Site Investigation. 02/17/2010

Date of completion of Site Investigation. 03/17/2011

REMEDIAL ACTION DATES

Date of commencement of Remediation. 02/17/2010

Date of completion of Remediation. 09/04/2019

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

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: 12/18/2019 _____

Email: Phil_Hamlin@oxy.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: 12/18/2019 _____

Remediation Project Number: 5389 _____

COA Type**Description**

	Based on the information presented, it is concluded 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**

402252244	FORM 27-SUPPLEMENTAL-SUBMITTED
402252489	LOGS
402255390	GROUND WATER ELEVATION MAP
402255396	SOIL SAMPLE LOCATION MAP
402255397	SITE MAP
402267132	ANALYTICAL RESULTS

Total Attach: 6 Files

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

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

Total: 0 comment(s)