

# State of Colorado Oil and Gas Conservation Commission

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402588778

Receive Date:

Report taken by:

## 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: KERR MCGEE OIL & GAS ONSHORE LP		Operator No: 47120	Phone Numbers Phone: (970) 336-3500 Mobile: ( )
Address: P O BOX 173779			
City: DENVER	State: CO	Zip: 80217-3779	
Contact Person: Phil Hamlin		Email: Phil_Hamlin@oxy.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9302

Initial Form 27 Document #: 200437794

#### 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 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: TANK BATTERY	Facility ID: 446224	API #:	County Name: WELD
Facility Name: PLATTE 26-2		Latitude: 40.259112	Longitude: -104.855170
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNE	Sec: 2	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications GC

Most Sensitive Adjacent Land Use Rangeland

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

Water well approximately 160 feet (ft) east, surface water and wetlands located approximately 290 ft southwest, and groundwater approximately 3 ft below ground surface (bgs).

# 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
Yes	GROUNDWATER	See attached data	Groundwater Sampling/Laboratory Analysis
Yes	SOILS	30ft N-S x 65ft E-W x 4ft bgs	Soil Sampling/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.

In February 2013, a drain valve on the back of the oil tank at the Clack 1-2A, Olson 2-2 facility froze and ruptured. Approximately 16 barrels (bbls) of condensate and 15 bbls of produced water were released within the tank battery containment berm, which was lined with a geosynthetic Claymax® liner. The remaining condensate and produced water were removed from the leaking aboveground storage tank (AST). A vacuum truck was used to recover approximately 10 bbls of condensate from within the tank battery containment berm.

## 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 ):

On August 4 and 6, 2015, a subsurface assessment was conducted to determine if soil outside the secondary containment had been impacted. Eight assessment soil borings (SB01 through SB08) were advanced around the tank battery, and two 45-degree angle soil borings (UTSB01 West and UTSB02 East) were advanced under the two ASTs within the containment. The soil samples were submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX) and total petroleum hydrocarbons (TPH). Laboratory analytical results indicated that benzene and/or TPH concentrations exceeded the Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels beneath the ASTs within the lined containment. BTEX and TPH concentrations were in full compliance with COGCC Table 910-1 allowable levels outside of the containment. The impacted soil beneath the ASTs are assessed on an annual basis via additional 45-degree angle soil borings. Soil results are summarized in Table 1.

### Proposed Groundwater Sampling

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

On August 4 and 6, 2015, assessment soil borings SB01 through SB08 were completed as monitoring wells MW01 through MW08, respectively. Groundwater monitoring proceeded on a quarterly basis in August 2015, and was discontinued following approval of the Form 27 Supplemental dated April 16, 2019.

### 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 17  
Number of soil samples exceeding 910-1 4  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 1950

### NA / ND

-- Highest concentration of TPH (mg/kg) 1750  
NA Highest concentration of SAR           
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 3

### Groundwater

Number of groundwater samples collected 120  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 3'  
Number of groundwater monitoring wells installed 8  
Number of groundwater samples exceeding 910-1 16

-- Highest concentration of Benzene (µg/l) 1100  
ND Highest concentration of Toluene (µg/l)           
-- Highest concentration of Ethylbenzene (µg/l) 29.4  
-- Highest concentration of Xylene (µg/l) 279  
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?

☐ 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?

The August 2015 site assessment indicated that soil outside of the lined containment was in full compliance with COGCC Table 910-1 allowable levels. It is estimated that approximately 52 cubic yards of residual impacted soil remain in place beneath the two ASTs and above the Claymax® liner. The impacted soil left in place is assessed on an annual basis via additional 45-degree angle soil borings beneath the two ASTs. The additional soil assessment results will be provided to the COGCC in annual supplemental Form 27s, until a request for No Further Action is warranted.

# 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.

Approximately 80 cubic yards of petroleum hydrocarbon impacted soil were removed from within the lined containment to the depth of the geosynthetic Claymax® liner on the south side of the containment to accommodate the installation of a product recovery system, as described under the Remediation Summary section. The impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. Approximately 52 cubic yards of residual impacted soil remain in place beneath the ASTs within the Claymax® liner.

## 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.

In March 2013, a product recovery system was constructed. The recovery system consists of two 3-inch recovery wells with 1-inch polyvinyl chloride (PVC) recovery pipes installed horizontally above the geosynthetic Claymax® liner. Approximately 10 gallons of product were removed from the two PVC recovery wells. Based on diminishing product recovery, efforts were discontinued in July 2014. The recovery wells are depicted on Figure 1.

## 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) \_\_\_\_\_ 80

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_ 149007

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 \_\_\_\_\_ Product Recovery (Above the Geosynthetic Claymax® Liner)

## 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.

Assessment soil borings SB01 through SB08 were completed as monitoring wells MW01 through MW08, respectively, in August 2015. As of the February 2019 quarterly monitoring event, BTEX concentrations in monitoring wells MW01 through MW08 were in full compliance with COGCC Table 910-1 allowable levels for four consecutive quarterly monitoring events. Based on the soil and groundwater data, the impacted soil in place above the liner had not contributed impacts to the groundwater. Therefore, Kerr-McGee requested to discontinue the quarterly groundwater monitoring program in the Form 27 Supplemental dated April 16, 2019 (Document No. 401940522). The discontinuation of the groundwater monitoring program was subsequently approved by the COGCC. Following the approval of the Form 27 Supplemental, groundwater monitoring wells MW01 through MW08 were abandoned. The former groundwater monitoring well locations are depicted on Figure 1.

## REMEDIATION 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:

The petroleum hydrocarbon impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. The recovered condensate from the product recovery system was transported to the Oil Polishing Facility for reuse.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 80

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 \_\_\_\_\_ 1

E&P waste (liquid) description \_\_\_\_\_ 10 gallons of condensate from  
product recovery system (July 2014)

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

Non-COGCC Disposal Facility: \_\_\_\_\_ Oil Polishing 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? No \_\_\_\_\_

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? No \_\_\_\_\_

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 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. 02/13/2013

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 02/13/2013

Date of commencement of Site Investigation. 08/05/2015

Date of completion of Site Investigation. 08/17/2015

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 02/13/2013

Date of completion of Remediation. \_\_\_\_\_

### **SITE RECLAMATION DATES**

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

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

### **OPERATOR COMMENT**

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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: ` \_\_\_\_\_

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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 9302

### **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**

402588927	SITE MAP
402598915	ANALYTICAL RESULTS

Total Attach: 2 Files

### **General Comments**

#### **User Group**

#### **Comment**

#### **Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)