

# State of Colorado Oil and Gas Conservation Commission

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

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9407

Initial Form 27 Document #: 200438326

#### 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: SPILL OR RELEASE	Facility ID: 443083	API #:	County Name: WELD
Facility Name: SPILL/RELEASE POINT	Latitude: 40.215889	Longitude: -104.938253	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNW	Sec: 19	Twp: 3N	Range: 67W
Meridian: 6	Sensitive Area? Yes		

#### SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Agriculture

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

Water well approximately 570 feet (ft) northwest, livestock approximately 1,180 feet north, occupied building approximately 850 ft south, and groundwater approximately 5 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	36ft N-S x 30ft E-W x 8.5ft 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.

While deconstructing the HSR-Sekich 31-19 (formally HSR-Sekich-63N67W/19SWNW) location, soil with historical petroleum hydrocarbon impacts was encountered beneath the production tanks. 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 ):

On August 24 and 25, 2015, seven soil samples were collected from the excavation sidewalls for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), pH, and specific conductivity (EC). Laboratory analytical results indicated that the soil samples were in full compliance with COGCC Table 910-1 allowable levels for TPH, BTEX, and EC at the lateral extent of the excavation. Soil sample N01 @ 6.5' exceeded the COGCC Table 910-1 allowable level for pH at 9.07 standard units. However, this sample was collected below the root zone (depth greater than 3 ft bgs); therefore, no further excavation was necessary.

### Proposed Groundwater Sampling

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

On August 25, 2015, one 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 levels for benzene and total xylenes at concentrations of 45.7 micrograms per liter (µg/L) and 3,090 µg/L, respectively. The groundwater sample analytical results are summarized in Table 1.

Groundwater monitoring has been conducted on a quarterly basis since December 2015.

### 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 7

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 1110

### NA / ND

-- Highest concentration of TPH (mg/kg) 1250

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 7

### Groundwater

Number of groundwater samples collected 170

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 5'

Number of groundwater monitoring wells installed 15

Number of groundwater samples exceeding 910-1 22

-- Highest concentration of Benzene (µg/l) 3690

-- Highest concentration of Toluene (µg/l) 1960

-- Highest concentration of Ethylbenzene (µg/l) 377

-- Highest concentration of Xylene (µg/l) 4020

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?

## 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 270 cubic yards of impacted soil were removed from the 2007 excavation 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 groundwater table due to past seasonal fluctuations. The general site layout and excavation footprint are depicted on the Site Map provided as Figure 1.

## **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.

While backfilling the excavation, 150 pounds of COGAC®, a carbon-based bioremediation product designed to capture and degrade petroleum hydrocarbons via chemical oxidation and passive bio-stimulation, were applied to the clean backfill in a series of lifts in the capillary and phreatic horizons.

Measurable free product was detected in monitoring well MW02 in September 2016. In October 2016, MW02 was replaced with two-inch monitoring well MW02R. A product skimmer was installed in the well in March 2017, and product recovery events resumed on a bi-monthly schedule. To date, a total of approximately 710 gallons of free product mixed with groundwater have been purged from the monitoring well and transferred to a Kerr-McGee produced water sump or transferred to the Aggregate Recycle Facility in Weld County, Colorado, for recycling. The quarterly depth to water and depth to product measurements are summarized in Table 1.

On August 14, 2019, three fluid recovery wells (EFR01 through EFR03) were installed around groundwater monitoring well MW02R. First event October 30, 2019. A series of enhanced fluid recovery events were conducted on October 17, 2019, October 31, 2019, and December 13, 2019 to address remaining free product in MW02R. Monitoring well MW02R has been in full compliance with COGCC Table 910-1 allowable levels for BTEX since the enhanced fluid recovery events were initiated. The EFR wells are depicted on Figure 1. Laboratory analytical results are summarized in Table 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) 270

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**

Yes Bioremediation ( or enhanced bioremediation )

Yes Chemical oxidation

No Air sparge / Soil vapor extraction

Yes Natural Attenuation

Yes Other COGAC® Application and Free Product Removal

## **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.

In November 2020, temporary monitoring wells TMW01 and TMW02, which are abandoned annually for the harvest season, were reinstalled at the site. Boring logs with well completion diagrams are attached.

Monitoring wells MW01 through MW09, TMW03, and TMW04 and temporary monitoring wells TMW01 and TMW02 are sampled on a quarterly basis and submitted for laboratory analysis of BTEX by United State Environmental Protection Agency Method 8260D. The monitoring well locations are depicted on Figure 1. A Groundwater Elevation Contour Map generated using the January 2021 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical reports for the October 2020 and January 2021 groundwater monitoring events are attached.

Groundwater has been compliant with COGCC Table 910-1 allowable levels for BTEX as of the October 2020 groundwater monitoring event. If groundwater continues to remain compliant for two more quarters, this site will have achieved four consecutive quarterly monitoring events by July 2021. Kerr-McGee Oil and Gas Onshore, LP is requesting a variance to continue sampling groundwater for BTEX under the COGCC Table 910-1 standards, as defined under the 900 Series Rule 915.f. for Remediations in Progress. If compliance is lost and quarterly monitoring is projected to continue past January 15, 2022, groundwater monitoring will switch to include the full list of Table 915-1 analyses.

## 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.

Volume of E&P Waste (solid) in cubic yards 270

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 0

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

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

Non-COGCC 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? 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? Yes \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? Yes \_\_\_\_\_

Is additional groundwater monitoring to be conducted? Yes \_\_\_\_\_

## 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 facility was deconstructed. The site will be reclaimed in accordance with COGCC 1000 Series Reclamation 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. 08/26/2015

Actual Spill or Release date, if known. 08/26/2015

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 08/24/2015

Date of commencement of Site Investigation. 08/26/2015

Date of completion of Site Investigation. 02/16/2018

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 08/26/2015

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

### **SITE RECLAMATION DATES**

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

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

**OPERATOR COMMENT**

Pursuant to the recently approved Rule 915.f. for sites that are subject to an open Form 27, we are seeking the Director's approval to continue to seek compliance with Table 910-1 until such time that remediation is completed, or until January 15, 2022, whichever comes first.

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: 04/01/2021

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: 04/05/2021

Remediation Project Number: 9407

**Condition of Approval**

<b><u>COA Type</u></b>	<b><u>Description</u></b>
	This report serves as adequate project summary and status update required to be submitted prior to April 15, 2021 as per rule 913.e.(2).
	Submit reports of site investigation and progress of remediation including results of quarterly groundwater sampling and analysis on an annual basis or more often until the remediation project is closed.
	In accordance with Rule 915.f, COGCC approves Operators request to comply with the version of Table 910-1 that was previously in effect for Remediation #9407 provided that Remediation is completed by January 15, 2022. If Remediation is not completed by January 15, 2022, then the Operator will comply with the current version of Table 915-1.
3 COAs	

**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.

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
402622545	FORM 27-SUPPLEMENTAL-SUBMITTED
402622595	LOGS
402626285	SITE MAP
402626287	GROUND WATER ELEVATION MAP
402639823	ANALYTICAL RESULTS

Total Attach: 5 Files

**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
		Stamp Upon Approval

Total: 0 comment(s)