

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

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>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Phillip Hamlin</u>	Email: <u>Phillip_Hamlin@oxy.com</u>	
		Phone: <u>(970) 336-3500</u>
		Mobile: <u>(970) 515-1161</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9106 Initial Form 27 Document #: 2143456

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>439681</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.040113</u>	Longitude: <u>-104.872339</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>22</u>	Twp: <u>1N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Retention ponds are located approximately 940 feet southeast and 1,000 feet west of the release location. A creek is located approximately 1,080 feet southeast of the release location. The nearest domestic water well is located approximately 1,110 feet east of the release location. Multiple buildings and livestock holding pens are located within ¼ mile 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
Yes	GROUNDWATER	See attached data	Groundwater sampling and laboratory analysis
Yes	SOILS	58' (E-W) x 40' (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 October 30, 2014, historical impacts were discovered during tank battery reconstruction activities at the Albert Sack Unit 1 production facility, and excavation activities were initiated. Groundwater was encountered in the excavation area at approximately 10 feet below ground surface (bgs). The COGCC issued Spill/Release Point ID 439681 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 (COGCC Document No. 2143456), and a previous Form 27-Supplemental update (COGCC Document No. 401563094). Based on the data presented, impacted soils in the excavation area were remediated to be in full compliance with the COGCC Table 910-1 standards. Based on the date of discovery and initiation of excavation activities (October 30, 2014), the COGCC Table 910-1 soil standards have been applied to the soil analytical results at this location.

Proposed Groundwater Sampling

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

Between April 2, 2015 and June 7, 2021, a total of fifty-one (51) temporary groundwater monitoring wells were installed to further assess the extent of groundwater impacts and for remediation purposes. All monitoring wells, with the exception of BH05R2 and BH16, were temporarily abandoned for spring agricultural and seeding considerations during the First Quarter 2021, and were replaced prior to the Second Quarter 2021 monitoring event. Quarterly groundwater monitoring was initiated on April 14, 2015 and is ongoing at existing monitoring wells BH01R3, BH02R4, BH05R2, BH08R3, BH09R3, BH10R4, BH11R4, BH12R3 - BH15R3, and BH16. Groundwater analytical data is presented in Table 1, and the groundwater sample locations are illustrated on Figure 1. The laboratory analytical report for the Third Quarter 2021 groundwater monitoring event is 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):

[Empty text box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

[Empty text box for additional investigative actions]

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 15
Number of soil samples exceeding 915-1 5
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1020

NA / ND

-- Highest concentration of TPH (mg/kg) 1908
NA Highest concentration of SAR
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 230
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 8'
Number of groundwater monitoring wells installed 51
Number of groundwater samples exceeding 915-1 67

-- Highest concentration of Benzene (µg/l) 5220
-- Highest concentration of Toluene (µg/l) 1400
-- Highest concentration of Ethylbenzene (µg/l) 1300
-- Highest concentration of Xylene (µg/l) 9310
NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected
0 Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Hydrocarbon-impacted groundwater has historically been detected in off-site temporary groundwater monitoring wells BH09, BH09R, BH09R2, BH09R3, BH11R, and BH11R3.

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?

Impacted groundwater remains at the site. The 12 existing temporary groundwater monitoring wells (BH01R3, BH02R4, BH05R2, BH08R3, BH09R3, BH10R4, BH11R4, BH12R3 - BH15R3, and BH16) will continue to be sampled on a quarterly basis and submitted for laboratory analysis of Table 915-1 constituents.

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 October 30 and November 14, 2014, approximately 500 cubic yards of impacted material were excavated and transported to the Front Range 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 the COGCC Table 910-1 standards. Prior to backfilling, approximately 264 pounds of OxPure® activated carbon were added to the excavation to mitigate remaining hydrocarbon impacts in groundwater. Air sparge / enhanced fluid recovery (AS/EFR) were selected as remedial technologies to address remaining soil and groundwater impacts. Bi-weekly mobile AS/EFR events were conducted at the site between October 19, 2016 and January 26, 2018, under an approved USEPA Underground Injection Control (UIC) permit application. A total of approximately 233 barrels of impacted groundwater were removed during AS/EFR activities. In January 2018, quarterly groundwater monitoring and AS/EFR events were suspended, pending the construction of a well pad and production facility at this location. Tank battery reconstruction activities were completed in February 2019 and replacement temporary monitoring wells were subsequently installed. Quarterly groundwater monitoring is ongoing and will be continued until concentrations remain in compliance with the COGCC Table 915-1 standards. Additional remedial activities may be evaluated, as needed, to address remaining groundwater impacts. 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

<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) _____ 500
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Natural Attenuation	No Excavate and onsite remediation
_____ Other _____	_____ 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, OxPure® activated carbon application, 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.

Between April 2, 2015 and June 7, 2021, a total of 51 temporary groundwater monitoring wells were installed to further assess the extent of groundwater impacts and for remediation purposes. All monitoring wells, with the exception of BH05R2 and BH16, were temporarily abandoned for spring agricultural and seeding considerations during the First Quarter 2021, and were replaced prior to the Second Quarter 2021 monitoring event. The 12 existing temporary monitoring wells (BH01R3, BH02R4, BH05R2, BH08R3, BH09R3, BH10R4, BH11R4, BH12R3 - BH15R3, and BH16) will continue to be sampled on a quarterly basis and submitted for laboratory analysis of Table 915-1 constituents. Cross-gradient and historically compliant groundwater monitoring well BH16 was selected from the Third Quarter 2021 monitoring event as a background location for comparison to inorganic groundwater standards in Table 915-1. Based on a comparison to site-specific background concentrations, inorganic concentrations (chloride, sulfate, and/or total dissolved solids) in point-of-compliance (POC) monitoring wells BH05R2, BH10R4, and BH12R3 were above the Table 915-1 standards for inorganic constituents during the Third Quarter 2021 monitoring event. Kerr-McGee will continue to evaluate POC for Table 915-1 standards on a quarterly basis, based on the site-specific local background concentrations. The current and former temporary monitoring well locations are illustrated on Figure 1, and a potentiometric surface contour map for the Third Quarter 2021 is presented as Figure 2. Well completion logs for the temporary monitoring wells are provided as Attachment B.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

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 500

E&P waste (solid) description Hydrocarbon-impacted soil

COGCC Disposal Facility ID #, if applicable: _____

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

Volume of E&P Waste (liquid) in barrels 313

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

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? No

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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 facility infrastructure 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 provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, or date of discovery. 10/30/2014

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/30/2014

Proposed site investigation commencement. 10/30/2014

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/30/2014

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

Based on the date of discovery and initiation of excavation activities (October 30, 2014), the COGCC Table 910-1 soil standards have been applied to the soil analytical results at this location. Kerr-McGee will continue to provide annual Form 27-Supplemental updates for this site. The Project Implementation Summary is provided as Attachment C.

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 Environmental Rep

Submit Date: 10/25/2021

Email: Phillip_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: CHRIS CANFIELD

Date: 11/05/2021

Remediation Project Number: 9106

Condition of Approval**COA Type****Description**

	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
	Based on the information presented, it appears 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 groundwater is found to be impacted, then further investigation and/or remediation activities may be required.
2 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.

Att Doc Num**Name**

402835690	FORM 27-SUPPLEMENTAL-SUBMITTED
402835719	LOGS
402835720	GROUND WATER SAMPLE LOCATION
402835721	GROUND WATER ELEVATION MAP
402835722	ANALYTICAL RESULTS
402835723	IMPLEMENTATION SCHEDULE
402835724	ANALYTICAL RESULTS

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)