

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.

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>	Phone: <u>(970) 336-3500</u>
	Zip: <u>80217-3779</u>	Mobile: <u>()</u>
Contact Person: <u>Phillip Hamlin</u>	Email: <u>Phil_Hamlin@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 4493 Initial Form 27 Document #: 1944350

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>TANK BATTERY</u>	Facility ID: <u>318506</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UPRR 53 PAN AM J-62N65W 11SWNE</u>	Latitude: <u>40.156061</u>	Longitude: <u>-104.627281</u>	
	** correct Lat/Long if needed: Latitude: <u>40.153336</u>	Longitude: <u>-104.621928</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>11</u>	Twp: <u>2N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Pasture and 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 175 feet (ft) east and groundwater approximately 8 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 Samples/Lab Analysis
Yes	SOILS	100' N-S X 120' E-W X 15' bgs	Soil Samples/Lab 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 January 2009, field crews encountered historical petroleum hydrocarbon impacted soil while removing the production tank and upgrading the tank battery at the UPRR 53 Pan Am J 1 facility. 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 January 16 and February 4, 2009, 20 confirmation soil samples were collected from the excavation sidewalls. The soil samples were submitted for laboratory analysis of total petroleum hydrocarbons (TPH) by United States Environmental Protection Agency (USEPA) Method 8015. The analytical results confirmed that TPH concentrations were in full compliance with the Colorado Oil and Gas Conservation Commission (COGCC) sensitive area allowable level of 1,000 milligrams per kilogram (mg/kg) at the extent of excavation. The soil samples were not analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) as the samples were collected prior to the April 1, 2009, COGCC rule changes.

Proposed Groundwater Sampling

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

On January 16, 2009, an excavation groundwater sample (GW01) was submitted for laboratory analysis of BTEX by USEPA Method 8260B. Analytical results for sample GW01 indicated that concentrations of all four BTEX constituents exceeded the COGCC Table 910-1 allowable levels. Based on the analytical results, approximately 80 barrels of impacted groundwater were removed from the excavation and transported to a licensed injection facility for disposal. On February 5, 2009, a second groundwater sample (GW02) was collected from the excavation. Laboratory analytical results for groundwater sample GW02 indicated that benzene, toluene, and total xylenes concentrations continued to exceed the COGCC allowable levels. Groundwater monitoring has been conducted on a quarterly basis since April 2009. The excavation groundwater sample locations are depicted on the Site Map provided as Figure 1. The groundwater sample analytical results are summarized in Table 1.

Proposed Surface Water Sampling

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

[Empty box for surface water sampling details]

Additional Investigative Actions

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

[Empty box for additional investigative actions]

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 20
Number of soil samples exceeding 915-1 8
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 12000

NA / ND

-- Highest concentration of TPH (mg/kg) 4160
NA Highest concentration of SAR
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 10

Groundwater

Number of groundwater samples collected 1082
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 8'
Number of groundwater monitoring wells installed 31
Number of groundwater samples exceeding 915-1 256

-- Highest concentration of Benzene (µg/l) 11000
-- Highest concentration of Toluene (µg/l) 13000
-- Highest concentration of Ethylbenzene (µg/l) 9400
-- Highest concentration of Xylene (µg/l) 62000
NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected
 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?

Groundwater impacts were detected in the adjoining pasture north of the tank battery.

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 4,500 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado. The petroleum hydrocarbon impacted soil was excavated into the phreatic zone to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations. Approximately 80 barrels of petroleum hydrocarbon impacted groundwater were removed from the excavation and transported to a licensed injection facility 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.

Please refer to the Remediation Summary Attachment.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 4500

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007

_____ Natural Attenuation

No _____ Excavate and onsite remediation

_____ Other _____

No _____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)

Yes _____ Chemical oxidation

Yes _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____
Groundwater Removal and
MicroBlaze® Application (2009);
BOS 200® Injection (2019)

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.

Groundwater monitoring wells MW01, MW02, MW04, MW07, MW08, MW09, and MW11 through MW16 are sampled on a quarterly basis for the full list of analyses for groundwater in Table 915-1. Cross-gradient and historically compliant groundwater monitoring well MW14 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the January 2022 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1, and the laboratory analytical reports for the April 2021, July 2021, October 2021, and January 2022 groundwater monitoring events are attached.

Groundwater monitoring will continue on a quarterly basis until a No Further Action status request is warranted.

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:

Approximately 4,500 cubic yards of petroleum hydrocarbon impacted soil were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 4500
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 80
E&P waste (liquid) description Petroleum hydrocarbon impacted groundwater
COGCC Disposal Facility ID #, if applicable: 159443
Non-COGCC 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 was restored to its pre-release grade. The Kerr-McGee production facility was reconstructed.

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. 01/12/2009

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/16/2009

Proposed site investigation commencement. 01/12/2009

Proposed completion of site investigation. 04/10/2012

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/12/2009

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

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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: Phillip Hamlin

Title: Senior Environmental Rep.

Submit Date: 02/03/2022

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: 02/03/2022

Remediation Project Number: 4493

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

	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.
1 COA	

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**

402939327	FORM 27-SUPPLEMENTAL-SUBMITTED
402939495	SITE MAP
402939496	GROUND WATER ELEVATION MAP
402939500	ANALYTICAL RESULTS
402946525	REMEDATION PROGRESS REPORT

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)