

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
Candice (Nikki) Graber

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>Gregory Hamilton</u>	Email: <u>Gregory_Hamilton@oxy.com</u>	
		Phone: <u>(970) 336-3500</u>
		Mobile: <u>(970) 515-1698</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21444 Initial Form 27 Document #: 402911309

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

Yes Multiple Facilities

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>480679</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Roland X 28-3 & 28-4 battery</u>	Latitude: <u>40.116506</u>	Longitude: <u>-104.675791</u>	
	** correct Lat/Long if needed: Latitude: <u>40.116558</u>	Longitude: <u>-104.675825</u>	
QtrQtr: <u>NWNW</u>	Sec: <u>28</u>	Twp: <u>2N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>481528</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Roland X 28-4 Tank Battery Release</u>	Latitude: <u>40.116539</u>	Longitude: <u>-104.675826</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>28</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 SC

Most Sensitive Adjacent Land Use Crop land

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

The nearest domestic water well is located approximately 320 feet northeast of the facility.

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	SOILS	37' (N-S) x 33' (E-W) x 8' bgs	Inspection/soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

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

Tank battery decommissioning activities were completed at the Roland X 28-4 O SA production facility location on February 1, 2022. Visual inspection and field screening of soils at the former production facility infrastructure locations were conducted following tank battery decommissioning activities, and ten (10) confirmation soil samples were collected from the former separator, above-ground storage tank (AST), and produced water vessel (PWV) locations, at depths ranging from approximately 3 inches to 6 feet below ground surface (bgs). The soil samples were submitted for laboratory analysis of BTEX, naphthalene, and TPH-GRO, DRO (C10-C28) ORO (C28-C40). Based on field observations and preliminary analytical results, soil sample PW-W02@5' was selected for waste characterization and was submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite. Laboratory analytical results indicated that soil impacts were present at the former PWV location due to benzene, trimethylbenzene (TMB), and PAH concentrations above the applicable COGCC Table 915-1 soil standards. As such, a Form 19-Initial/Supplemental Spill/Release Report (Document No. 402945824) was submitted on February 3, 2022, and the COGCC issued Spill/Release Point ID 481528. Additionally, historical soil impacts due to PAHs were discovered during removal of the flowline for the associated Roland X 28-4 wellhead, adjacent to the former production facility location. As such, sample FL-B06@4' was also selected for waste characterization and submitted for full Table 915-1 analyses. Groundwater was not encountered during facility decommissioning, flowline removal, or subsequent excavation activities at this site. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample location and field screening data are presented in Table 1. The soil sample and field screening locations are illustrated on Figures 2 and 3.

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 March 15, 2022, excavation activities were conducted to address remaining soil impacts at the former PWV and flowline locations. On March 15, 2022, 10 soil samples were collected from the base and sidewalls of the final PWV excavation extent, and 5 confirmation soil samples were collected from the final flowline excavation extent, at depths ranging from 5 to 8 feet bgs. Based on the waste characterization results, the confirmation soil samples were submitted for laboratory analysis of BTEX, TMB, TPH, and PAHs. Analytical results indicate that constituent concentrations in the 15 confirmation soil samples collected from the final PWV and flowline excavation extents were in compliance with COGCC Table 915-1 standards. Analytical results indicate that constituent concentrations in the remaining soil samples collected during decommissioning activities on February 1, 2022 were in compliance with the applicable COGCC standards. Soil analytical data is presented in Tables 2 through 5.

Proposed Groundwater Sampling

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

Groundwater was not encountered during facility decommissioning, flowline removal, or subsequent excavation activities at this site.

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):

On February 1 through 7, 2022, visual inspection and field screening of soils was conducted at one location below the former AST, one location at the meter house, one location at the former emissions control device (ECD), and six pothole locations during removal of the associated Roland X 28-4 flowline. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the COGCC Operator Guidance for Oil & Gas Facility Closure document. Soil sample location and field screening data are presented in Table 1. Soil analytical results are presented in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figures 2 and 3. The laboratory analytical reports are provided as Attachment A. The field notes and a photographic log are provided as Attachment B.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 26
Number of soil samples exceeding 915-1 7
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 750

NA / ND

-- Highest concentration of TPH (mg/kg) 222.6
-- Highest concentration of SAR 1.17
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet)
Number of groundwater monitoring wells installed
Number of groundwater samples exceeding 915-1

Highest concentration of Benzene (µg/l)
Highest concentration of Toluene (µg/l)
Highest concentration of Ethylbenzene (µg/l)
Highest concentration of Xylene (µg/l)
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?

Were background samples collected as part of this site investigation?

Background soil samples PW-BG01@3' - PW-BG04@3' and PW-BG01@6' - PW-BG04@6' were collected from native material adjacent to the former production facility. The background soil samples were submitted for laboratory analysis of total metals and the Soil Suitability for Reclamation Parameters using standard methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are presented in Tables 4 and 5.

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.

Between February 1 and March 15, 2022, approximately 20 cubic yards of impacted material were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal, approximately 140 cubic yards of impacted material were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling, and approximately 9 cubic yards of impacted hydro-excavation slurry were removed and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado for recycling. The excavation areas were subsequently backfilled and contoured to match pre-existing site conditions.

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 PWV and flowline excavation areas have been remediated to be in compliance with the COGCC Table 915-1 standards. Laboratory analytical results indicate that constituent concentrations in the remaining confirmation soil samples collected from the former production facility infrastructure locations were in compliance with COGCC Table 915-1 standards. Hydrocarbon-impacted soil was not observed during field inspection and soil screening activities at the former AST, ECD, meter house, or remaining flowline pothole locations. Groundwater was not encountered during facility decommissioning, flowline removal, or subsequent excavation activities at this site. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- Yes _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____ 169
- _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
- No _____ Excavate and onsite remediation
- _____ Land Treatment
- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Other _____

Groundwater Remediation Summary

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other Final Report

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 NFA 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:

Approximately 140 cubic yards of impacted material were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling. Approximately 9 cubic yards of impacted hydro-excavation slurry were removed and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 169

E&P waste (solid) description 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 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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted? _____

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 will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules

Is the described reclamation complete? _____

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. 02/03/2022

Actual Spill or Release date, or date of discovery. 02/02/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/01/2022

Proposed site investigation commencement. 02/01/2022

Proposed completion of site investigation. 03/15/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/01/2022

Proposed date of completion of Remediation. 03/15/2022

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 analytical and field screening data provided herein, Kerr-McGee is requesting an NFA determination for this location.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Gregory Hamilton

Title: Environmental Consultant

Submit Date: 05/03/2022

Email: Gregory_Hamilton@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: Candice (Nikki) Graber

Date: 11/01/2022

Remediation Project Number: 21444

COA Type**Description**

	<p>Based on the information presented, it appears that no further remedial 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.</p> <p>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.</p>
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
403032539	FORM 27-SUPPLEMENTAL-SUBMITTED
403032701	PHOTO DOCUMENTATION
403032711	SITE MAP
403032712	SOIL SAMPLE LOCATION MAP
403032713	SOIL SAMPLE LOCATION MAP
403032714	ANALYTICAL RESULTS
403032715	ANALYTICAL RESULTS

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)