

State of Colorado Oil and Gas Conservation Commission

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Document Number:

401962387

Receive Date:

03/15/2019

Report taken by:

PETER GINTAUTAS

Site Investigation and Remediation Workplan (Initial 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: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Gregory Hamilton</u>	Email: <u>Gregory.Hamilton@anadarko.com</u>	Mobile: <u>(970) 515-1698</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 12741Initial Form 27 Document #: 401962387

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 checked="" 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: <u>SPILL OR RELEASE</u>	Facility ID: <u>461961</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>40.212433</u>	Longitude: <u>-104.736178</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWNE</u>	Sec: <u>23</u>	Twp: <u>3N</u>	Range: <u>66W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications MLMost Sensitive Adjacent Land Use Non-Crop LandIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

A livestock holding pen is located approximately 975 feet north 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	SOILS	41' (E-W) x 36' (N-S) x 6' 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 March 9, 2014, approximately 30 barrels of condensate were released inside secondary containment at the Sarchet 41-23, Sarchet UPRR 42-23 3X production facility. Approximately 25 barrels of condensate were recovered via vacuum truck and transferred to a licensed injection facility for disposal. The facility was subsequently shut-in, affected infrastructure was removed, and excavation activities were initiated. Groundwater was not encountered during excavation activities. The COGCC has issued Spill/Release Point ID 461961 for this release. A partially-buried produced water vessel was removed and replaced during excavation activities.

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 from the sidewalls and base of the excavation at depths ranging from 4 to 6 feet below ground surface (bgs). The soil samples were submitted to eAnalytics Laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbon (TPH) - gasoline range organics (GRO) by USEPA Method 8260C, and TPH - diesel and oil range organics (DRO and ORO) by USEPA Method 8015. Laboratory analytical results indicated that constituent concentrations in the soil samples collected from the final lateral and vertical extents of the excavation area were in full compliance with COGCC standards. Soil sample locations are illustrated on Figure 1 and soil analytical results are summarized in Table 1. The laboratory analytical reports are provided as Attachment A.

Proposed Groundwater Sampling

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

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):

A partially-buried produced water vessel was removed and replaced during excavation activities.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 9

Number of soil samples exceeding 910-1 1

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

Approximate areal extent (square feet) 1370

NA / ND

-- Highest concentration of TPH (mg/kg) 11874
.4

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 6

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 0

Number of groundwater samples exceeding 910-1 0

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

0 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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

On March 19 and 20, 2014, approximately 160 cubic yards of impacted material were excavated and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. A partially-buried produced water vessel was removed and replaced during excavation activities.

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 COGCC standards. Based on the analytical data presented herein, remediation is complete at this site. Upon COGCC approval of the Initial Form 27, Kerr-McGee will submit a Supplemental Form 27 request for a No Further Action (NFA) determination for this release.

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) _____ 160
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

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other One-time reporting

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Sump closure notification

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 160

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Buffalo Ridge Landfill - Keenesburg, 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: _____

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 infrastructure has been rebuilt and 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 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. 03/09/2014

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/09/2014

Date of commencement of Site Investigation. 03/09/2014

Date of completion of Site Investigation. 03/20/2014

REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/09/2014

Date of completion of Remediation. 03/20/2014

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Kerr-McGee originally submitted a Form 19 for the subject release on March 19, 2014; however, a COGIS database search conducted in January 2019 indicated no record of the 2014 document submittal. As a result, Kerr-McGee re-submitted the release information via Initial-Supplemental Form 19 (COGCC Document No. 401924669) on February 12, 2019, and the COGCC issued Spill/Release Point ID 461961. As noted in the Initial-Supplemental Form 19, this Initial Form 27 is being prepared to document the removal and replacement of a partially-buried produced water vessel during the excavation and remediation activities conducted in response to the subject release.

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

Signed: Gregory Hamilton

Title: Senior Staff Env Rep

Submit Date: 03/15/2019

Email: Gregory.Hamilton@anadarko.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: 03/17/2019

Remediation Project Number: 12741

COA Type

Description

	Submit reports of site investigation and progress of remediation including results of sampling and analysis on an annual basis or more often until remediation is closed.
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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

401962387	FORM 27-INITIAL-SUBMITTED
401962547	SOIL SAMPLE LOCATION MAP
401962582	ANALYTICAL RESULTS
401962584	ANALYTICAL RESULTS

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)