

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
402503464
Receive Date:
10/12/2020
Report taken by:
Kari Oakman

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 10773 Initial Form 27 Document #: 401457288

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 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 type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation	<input checked="" 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>453123</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>August Lambrecht GU #2</u>	Latitude: <u>40.068969</u>	Longitude: <u>-104.845728</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>12</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 Agriculture and Surface Water

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

Water well approximately 500 feet (ft) east, surface water approximately 80 ft south, livestock approximately 1,260 ft southwest, an occupied building approximately 580 ft southwest, and groundwater approximately 4 ft below ground surface (bgs).

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> 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
No	SOILS	38ft E-W x 22ft N-S x 4ft 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.

During plugging and abandonment activities at the August Lambrecht GU 2 tank battery facility, historical petroleum hydrocarbon impacts to groundwater were encountered beneath the partially-buried produced water vessel. Petroleum hydrocarbon impacted soil was not observed during excavation activities associated with the tank battery deconstruction. The volume of the release is unknown.

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 September 8 and 15, 2017, seven soil samples were collected from the excavation and submitted for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), pH, and specific conductivity (EC). Analytical results indicated that BTEX, TPH, pH, and EC concentrations and levels were compliant with Colorado Oil and Gas Conservation Commission (COGCC) Table 910-1 allowable levels at the lateral extent of the excavation. The soil sample locations and excavation dimensions are depicted on the Excavation Site Map provided as Figure 1. The soil sample analytical results are summarized on Table 1.

Proposed Groundwater Sampling

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

On September 8, 2017, 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 at 18.7 micrograms per liter (µg/L). On September 15, 2017, following the removal of approximately 80 barrels of impacted groundwater from the excavation, groundwater sample GW02 was collected for BTEX analysis. Laboratory analytical results for sample GW02 indicated that BTEX concentrations were in full compliance with COGCC Table 910-1 allowable levels and were less than the laboratory reporting limit of 4.00 µg/L. The excavation groundwater sample locations are depicted on Figure 1. The groundwater sample analytical results are summarized in Table 2.

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 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 836

NA / ND

-- Highest concentration of TPH (mg/kg) 77.9
NA Highest concentration of SAR
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 0

Groundwater

Number of groundwater samples collected 56
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 4'
Number of groundwater monitoring wells installed 6
Number of groundwater samples exceeding 910-1 4

-- Highest concentration of Benzene (µg/l) 18.7
-- Highest concentration of Toluene (µg/l) 18.6
-- Highest concentration of Ethylbenzene (µg/l) 2.28
-- Highest concentration of Xylene (µg/l) 16.5
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?

A background soil sample was submitted to the laboratory and placed on hold for analysis. Laboratory analytical results indicated that pH and EC levels were compliant at the extent of the excavation; therefore, the background soil sample was not run for laboratory analysis.

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.

Based on excavation groundwater samples exceeding COGCC Table 910-1 allowable levels, approximately 80 barrels of impacted groundwater were removed from the excavation using a vacuum truck and transported to the Aggregate Recycle Facility in Weld County, Colorado. The general site layout and excavation footprint are depicted on the Site Map provided as Figure 2.

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.

Groundwater monitoring wells were installed and are sampled on a quarterly basis to assess monitored natural attenuation.

Soil Remediation Summary

In Situ

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

Ex Situ

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
Yes _____ Other _____ Groundwater 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 August 2018, six groundwater monitoring wells (MW01 through MW06) were installed at the site. Groundwater monitoring continued on a quarterly basis. The monitoring well locations are depicted on Figure 2. Boring logs with monitoring well completion diagrams are attached.

On August 15, 2018, monitoring wells MW01 through MW06 were surveyed to obtain the relative groundwater and top-of-casing well elevation data. The survey data indicated the groundwater flow direction at the site is to the north-northeast. Relative groundwater elevations are provided in Table 2. Groundwater Elevation Contour Maps for the fourth quarter 2019 through third quarter 2020 monitoring events are provided as Figures 3A through 3D, respectively.

As of the August 2020 quarterly monitoring event, BTEX concentrations in monitoring wells MW01 through MW06 were in full compliance with COGCC Table 910-1 allowable levels for four consecutive quarterly monitoring events. The groundwater analytical results are summarized in Table 2. The laboratory analytical reports for the four compliant groundwater monitoring events are attached.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Final Report

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

Other NFA Status 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:

The petroleum hydrocarbon impacted groundwater was transported to the Aggregate Recycle Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

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: 434766

Non-COGCC Disposal Facility:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface?

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

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 facility was decommissioned. 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. 09/11/2017

Actual Spill or Release date, if known. 09/11/2017

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/08/2017

Date of commencement of Site Investigation. 09/08/2017

Date of completion of Site Investigation. 08/15/2018

REMEDIAL ACTION DATES

Date of commencement of Remediation. 09/11/2017

Date of completion of Remediation. 08/10/2020

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

--

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: 10/12/2020 _____

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: Kari Oakman _____

Date: 10/13/2020 _____

Remediation Project Number: 10773 _____

COA Type**Description**

	<p>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.</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>
--	--

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**

402503464	FORM 27-SUPPLEMENTAL-SUBMITTED
402503512	LOGS
402503766	ANALYTICAL RESULTS
402505816	GROUND WATER ELEVATION MAP
402505817	SITE MAP
402505818	SOIL SAMPLE LOCATION MAP

Total Attach: 6 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)