



**OXY USA Inc.**  
A subsidiary of Occidental Petroleum Corporation

760 Horizon Drive, Suite 101  
Grand Junction, CO 81506

July 20, 2010

Linda Spry O'Rourke  
Environmental Protection Specialist II  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

**Re: Submittal of Oxy's Form 27  
NOAV No. 200262741  
OXY USA inc. (Operator No. 66561)**

Dear Linda,

OXY USA Inc. (Oxy) is providing your office with the completed Colorado Oil and Gas Conservation Commission (COGCC) Form 27 (Site Investigation and Remediation Work plan) in support of the above referenced Notice of Alleged Violation (NOAV). The NOAV was issued on July 19, 2010.

Oxy requests that the COGCC consider the following informational corrections to the NOAV. In sentence two of the "Description of Alleged Violation" section, the date noted "7/12/10" is incorrect. Oxy contacted COGCC staff on "7/13/10".

The NOAV cites Oxy's Laramie Land and Cattle Co 17-3A well (05-077-09424-00), Facility ID 292987. Oxy believes that this location does not accurately reflect the associated area of concern. Oxy is centering its area of investigation around the Colorado Land #1 (API # 05-077-08402-00, pad location ID 311745. Oxy requests that the NOAV refer to the Colorado Land #1 location. Note that Oxy is submitting the COGCC Form 19 (Spill Report) with the Colorado Land #1 information.

This being said, Oxy has prepared the attached Form 27 with the location information from the Colorado Land #1 location.

Please let me know if you have any questions, comments, or if you require additional information. I can be reached at 970.263.3628 or at [Sean\\_Norris@oxy.com](mailto:Sean_Norris@oxy.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Sean T. Norris", is written over a light blue horizontal line.

Sean T. Norris  
Regulatory Lead

Enclosures

cc: file  
HES

State of Colorado  
**Oil and Gas Conservation Commission**



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

FOR OGCC USE ONLY

**SITE INVESTIGATION AND REMEDIATION WORKPLAN**

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

OGCC Employee:  
 Spill       Complaint  
 Inspection       NOAV  
 Tracking No:

**CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED**

Spill or Release     Plug & Abandon     Central Facility Closure     Site/Facility Closure     Other (describe): \_\_\_\_\_

OGCC Operator Number: <u>66561</u>	Contact Name and Telephone: <u>Alonzo Hernandez</u>
Name of Operator: <u>OXY USA Inc.</u>	No: <u>970-263-3609</u>
Address: <u>760 Horizon Drive, #101</u>	Fax: <u>970-263-3694</u>
City: <u>Grand Junction</u> State: <u>CO</u> Zip: <u>81506</u>	

API Number: <u>05-077-08402</u>	County: <u>Mesa</u>
Facility Name: <u>Colorado Land #1</u>	Facility Number: <u>311745</u>
Well Name: <u>Colorado Land</u>	Well Number: <u>#1</u>
Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>SWNW 17 10S 94W 6 PM</u> Latitude: <u>39.19219</u> Longitude: <u>107.91111</u>	

**TECHNICAL CONDITIONS**

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Suspect produced water/condensate from 1992 reported spill.

Site Conditions: Is location within a sensitive area (according to Rule 901e)?     Y     N    If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): Irrigated and Rangeland

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Cumulic Haploborolls, 1 to 3 percent slopes

Potential receptors (water wells within 1/4 mi, surface waters, etc.): Surface waters ~139' west to Grove Creek

**Description of Impact (if previously provided, refer to that form or document):**

Impacted Media (check):	Extent of Impact:	How Determined:
<input checked="" type="checkbox"/> Soils	<u>Soils involved, total extent to be determined</u>	<u>bell hole excavations</u>
<input type="checkbox"/> Vegetation	_____	_____
<input checked="" type="checkbox"/> Groundwater	<u>Groundwater involved, extent to be determined</u>	<u>Visual and sampling in bell hole excavations</u>
<input checked="" type="checkbox"/> Surface Water	<u>Surface water involved, extent limited to 300 feet of creek</u>	<u>Visual and water sampling</u>

**REMEDIATION WORKPLAN**

**Describe initial action taken (if previously provided, refer to that form or document):**

On 7-12, booms were immediately placed in Grove creek. A water sample was collected from a primary seep for qualitative assessment. On 7-15, nine bell holes were dug and sampled down gradient of the pad to gauge groundwater and to aid in determining the source of the release. The creek and observed seeps directly adjacent to the location have been flagged and sampled. Complete results are pending. Groundwater and some source material was pumped from the bell holes to assess aquifer flow characteristics for potential remediation method selection. See attached site diagram.

**Describe how source is to be removed:**

Several bell holes will be linked together into an interception trench and using a vacuum truck, water and source material will be skimmed from the trench. A second interception trench between the source area and the creek will be constructed and similar water and source skimming will be conducted to impress a reverse groundwater gradient to draw materials away from the creek seeps. Assessment of the remediation will be on-going. Additional remediation technologies may be implemented if warranted.

**Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:**

Soils from excavations will be landfarmed on the LL&CC 17-5 pad. Water and source material will be collected in frac tank similarly located on the LL&CC 17-5 pad until characterization and appropriate disposal options can be evaluated and selected. Additional assessment of source area and insitu remediation methods are being considered.



Tracking Number: \_\_\_\_\_  
Name of Operator: \_\_\_\_\_  
OGCC Operator No: \_\_\_\_\_  
Received Date: \_\_\_\_\_  
Well Name & No: \_\_\_\_\_  
Facility Name & No: \_\_\_\_\_

REMEDIATION WORKPLAN (Cont.)

OGCC Employee: \_\_\_\_\_

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

Deliniation of vertical and horizontal extent will allow for the development of a monitoring plan which will be submitted in future Form 27 addendums.

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. Use additional sheet for description if required.

It is anticipated that the surface expression of in-ground facilities will be removed and subsurface portions abandoned in place. The site will be regraded to existing contours as near as possible. During remediation, landowner representitives will be consulted for input on the desired seed mix and application rates for final desired land use. Site drawings and plans will be communicated in future Form 27 addendums. During the life of the remediation, noxious weeds will be treated to prevent infestation of disturbed areas.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required?  Y  N If yes, describe:

As stated on Page 1 of this remediation Work Plan, additional investigation of the potential source area will be made to confirm the suspected source area and close out suspicion of any surrounding production facilities. Plans for further assessment are being developed and will be communicated in Form 27 addendums.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

To be determined and communicated following complete determination of volumes and characterization of materials in future Form 27 addendums.

IMPLEMENTATION SCHEDULE

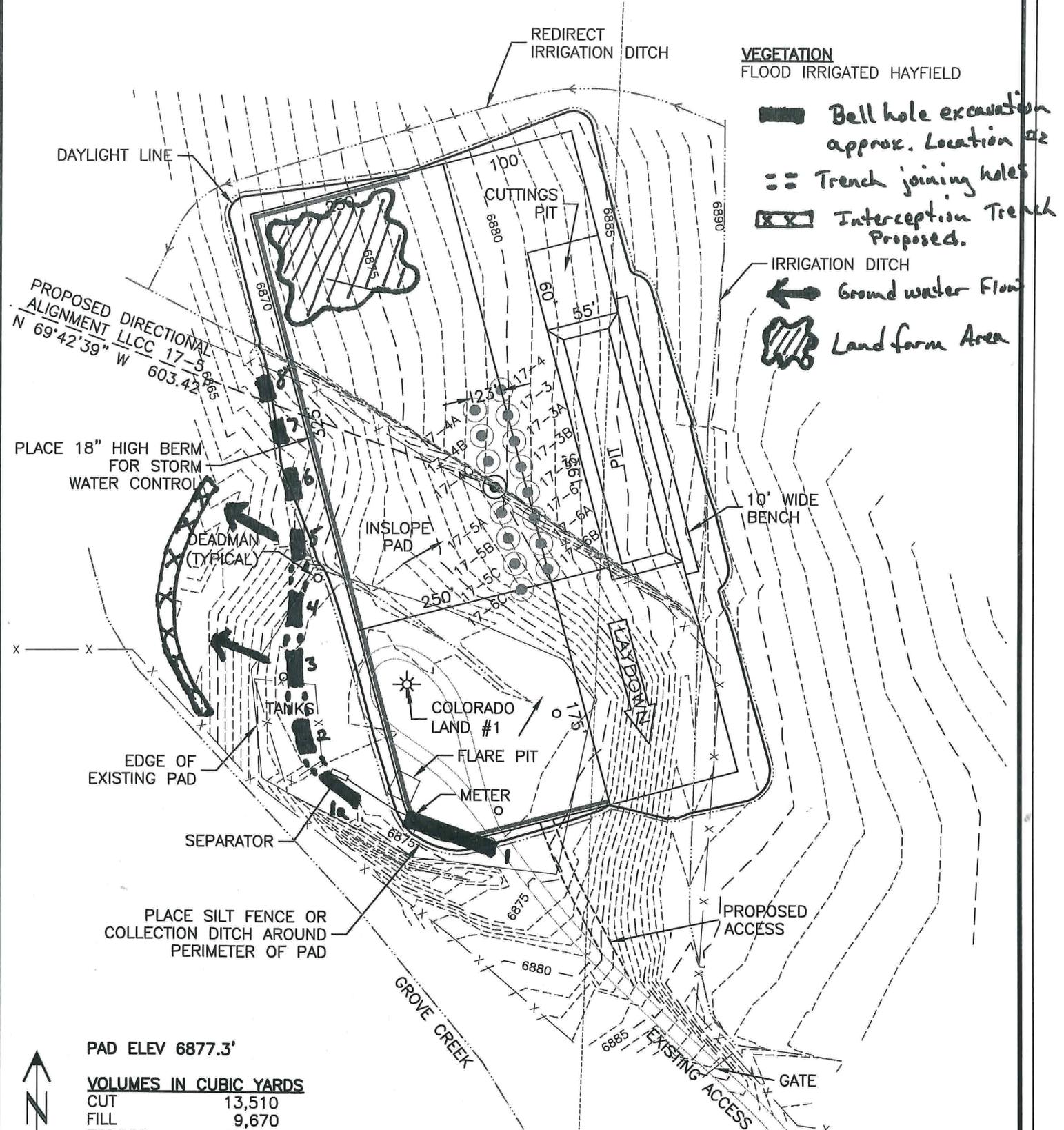
Date Site Investigation Began: 7/12/2010 Date Site Investigation Completed: Pending Date Remediation Plan Submitted: 7/20/2010  
Remediation Start Date: 7/17/010 Anticipated Completion Date: Pending Actual Completion Date: \_\_\_\_\_

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

Print Name: Sean T. Norris Signed: *Sean T. Norris*  
Title: Regulatory Lead Date: 7/20/2010

OGCC Approved: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

# PAD LAYOUT EXHIBIT "C1"

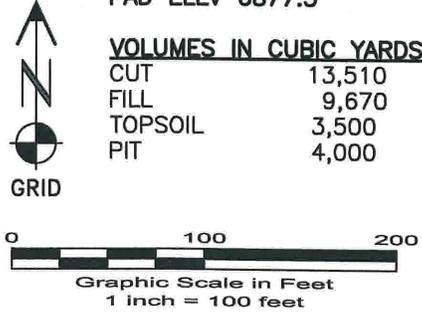


- VEGETATION**  
FLOOD IRRIGATED HAYFIELD
- Bell hole excavation approx. Location #2
  - Trench joining holes
  - Interception Trench Proposed.
  - Irrigation Ditch
  - Ground water Flow
  - Land form Area

PAD ELEV 6877.3'

**VOLUMES IN CUBIC YARDS**

CUT	13,510
FILL	9,670
TOPSOIL	3,500
PIT	4,000



**GEO SURV**  
LAND SURVEYING AND MAPPING  
LAFAYETTE - WINTER PARK  
Ph 303 666 0379 Fx 303 665 6320

**LARAMIE ENERGY LLC**  
LARAMIE LAND & CATTLE CO. 17-5  
SL SW1/4 NW1/4 SEC. 17 T10S R94W  
BH SW1/4 NW1/4 SEC. 17 T10S R94W  
6th PM MESA COUNTY COLORADO

DWG: G:\GEO SURV\barzard\WYwayRanch\_WellPlans\LLCC\LLCC 17-5.dwg  
 USER: mtc  
 DATE: Apr 25, 2007 12:55pm