



Kerr-McGee Oil & Gas Onshore LP
1099 18th Street, Suite 1800
Denver, Colorado 80202
720-929-6000 Fax 720-929-7000

February 28, 2014

Mr. Chris Canfield
Environmental Protection Specialist
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

**Re: No Further Action Status Request
Equinox 9-9, 15-9 Tank Battery
COGCC Spill Tracking No. 2147440
NESE 9-T1S-R67W**

Dear Mr. Canfield:

Kerr-McGee Oil and Gas Onshore LP (Kerr-McGee) is submitting this letter report as an update to the Form 19, submitted on December 27, 2013, for the Equinox 9-9, 15-9 produced water release. We are requesting a No Further Action (NFA) status for this site.

On December 19, 2013, a frost-free Balon valve on the produced water tank failed due to below freezing temperatures. Approximately 6.5 bbls of produced water were released through the failed valve into the tank battery containment berm. Following discovery, the wells were shut in, the tank battery was dismantled, and the petroleum hydrocarbon impacted soil was excavated.

Approximately 20 cubic yards of petroleum hydrocarbon impacted soil were removed from the excavation and transported to the Front Range Regional Landfill in Erie, Colorado for disposal. Kerr-McGee contracted LT Environmental, Inc. (LTE) to document excavation activities, collect confirmation soil samples from the excavation, and interpret the laboratory analytical results.

An LTE representative met a field crew at the site on January 20, 2014, following excavation of the impacted soil. The final excavation measured approximately 12 feet north-south by 15 feet east-west to an approximate depth of 2.5 feet below ground surface. Confirmation soil samples were collected from the excavation sidewalls and base for total petroleum hydrocarbon (TPH) analysis by Environmental Protection Agency (EPA) Methods 8015 and 8260B, benzene, toluene, ethylbenzene, and total xylenes (BTEX) analysis by EPA Method 8260B, pH analysis by EPA method 9045D, and electrical conductivity (EC) analysis by Method USDA 60 (3). The soil sample analytical results confirmed that TPH, BTEX, pH, and EC levels were within or below Colorado Oil and Gas Conservation Commission (COGCC) allowable levels at the extent of the excavation. Groundwater was not encountered in the excavation.

The excavation was backfilled with clean soil and the excavation area was restored to its pre-release grade. Kerr-McGee's production facility remains at the site. The general site layout, final excavation dimensions, and soil sample locations are shown on the attached Figure 1. The soil sample analytical results are presented in Table 1 and the laboratory analytical reports are attached.

The excavation soil sample analytical results confirm that TPH, BTEX, pH, and EC levels are within or below COGCC allowable levels at the extent of the excavation. Based on the soil sample analytical results, Kerr-McGee is requesting NFA status for this site.

Feel free to contact me at 720-929-6726 if you have any questions regarding this information.

Sincerely,

Kerr-McGee Oil & Gas Onshore LP



Paul Schwarz
EHS Representative

Attachments



IMAGE COURTESY OF ESRI/BING MAPS

LEGEND

-  RELEASE
-  SOIL SAMPLE
-  EXCAVATION EXTENT
-  BERM

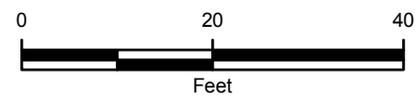


FIGURE 1
EXCAVATION SITE MAP
 EQUINOX 9-9, 15-9
 NESE SEC 9-T1S-R67W
 ADAMS COUNTY, COLORADO
 KERR-MCGEE OIL & GAS ONSHORE LP



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
EQUINOX 9-9, 15-9
ADAMS COUNTY, COLORADO
KERR-MCGEE OIL & GAS ONSHORE LP

Soil Sample ID	Depth (bgs)	Date	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	DRO (mg/kg)	GRO (mg/kg)	ORO (mg/kg)	pH (su)	Specific Conductance (mmhos/cm)
B01 @ 2.5'	2.5'	01/20/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50	7.06	0.691
E01 @ 2'	2'	01/20/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50	6.94	0.636
N01 @ 2'	2'	01/20/2014	<0.01	<0.01	<0.01	0.021	<50	<50	<50	6.89	1.08
S01 @ 2'	2'	01/20/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50	7.12	0.696
W01 @ 2'	2'	01/20/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50	7.08	0.619
COGCC Standards			0.17	85	100	175	500*	500*	500*	6-9	4

Notes: bgs - below ground surface
 < - less than laboratory reporting limit
 DRO - Diesel Range Organics
 ORO - Oil Range Organics
 GRO - Gasoline Range Organics
 * - Standard applies to combined DRO-GRO-ORO

mg/kg - milligrams per kilogram
 NA - Not Analyzed/Not Available
 Bold numbers indicate result equaled or exceeded standard.
 su - standard units
 mmhos/cm - millimhos per centimeter
 COGCC - Colorado Oil and Gas Conservation Commission



Test Report

eANALYTICS LABORATORY

January 21, 2014

Client: LT Environmental / Anadarko

Project: Equinox 9-9, 15-9

Lab ID: 619

Date Samples Received: 1/20/2014

Number of Samples: 6

Sample Condition: Samples arrived intact and in appropriate sample containers

Sample Temperature: Within acceptable range of 2-6° C, or as specified in EPA Method

The quality control procedures associated with the requested analyses were satisfactorily passed before the samples were run.

Thank you for allowing eAnalytics Laboratory to provide laboratory services for you.

Sincerely,



Christopher Dieken
Quality Assurance Manager



Todd Rhea
Laboratory Manager



Proudly certified by A2LA & The
United States Department of Defense
(DoD ELAP)

eAnalytics Laboratory

1767 Rocky Mountain Avenue Loveland CO 80538

Chain of Custody

eANALYTICS

LABORATORY

Chain of Custody Form

eANALYTICS LABORATORY			eANALYTICS LABORATORY																				
1767 Rocky Mountain Avenue Loveland CO 80538			Phone: (970) 667-6975			Fax: (970) 669-0941			www.eAnalyticsLab.com														
CLIENT INFORMATION <small>(*New Clients please fill out completely)</small>			ANALYSIS INFORMATION <small>(Select analysis by checking box on corresponding sample line)</small>																				
Company: <u>LTE</u>			Number of Containers	Matrix: (S) Soil (W) Water (V) Vapor (O) Other	BTEX	TPH	PH	EC	SAR	Other Instructions													
Project: <u>Equinox 9-9,15-9</u>																							
Project Manager: <u>Jon Cocroft</u>																							
Sampler: <u>Kris Shepherd</u>																							
Phone/Email: <u>jcocroft@ltenv.com</u>																							
Address:																							
Lab ID	Sample Name	Sampling Date/Time																					
1	N01@2'	1/20/14 1445 AM/PM	1	S																			
2	E01@2'	1/20/14 1450 AM/PM	1	S																			
3	S01@2'	1/20/14 1455 AM/PM	1	S																			
4	W01@2'	1/20/14 1500 AM/PM	1	S																			
5	B01@2.5'	1/20/14 1505 AM/PM	1	S																			
6	BG01	1/20/14 1510 AM/PM	1	S																			
		AM/PM																					
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Comments: Run N01, E01, S01, W01 & B01 for BTEX/TPH/pH/EC & hold for SAR. Hold BG01 to be ran for pH/EC/SAR pending results of those samples listed above.			Record of Custody Relinquished by: <u>[Signature]</u> Date <u>1/14/20</u> Company: <u>LTE</u> Time <u>1630</u> AM/PM Received by: _____ Date _____ Company: _____ Time _____ AM/PM Relinquished by: _____ Date _____ Company: _____ Time _____ AM/PM Received by: <u>[Signature]</u> Date <u>1/20/14</u> Company: <u>eANALYTICS</u> Time <u>1630</u> AM/PM																				
Turnaround Time (Business Days) TAT begins when sample is received by eANALYTICS <input type="radio"/> Normal (5-10 Days) <input type="radio"/> 3 Day (25%) <input type="radio"/> 2 Day (50%) <input type="radio"/> 1 Day (100%) <input checked="" type="radio"/> Same Day (300%) Rush analysis requires an extra charge. If possible please inform eANALYTICS in advance for rush analysis.																							
Colorado OPS Project : Yes / No																							
For eANALYTICS Use Samples Received Intact: <input checked="" type="radio"/> Yes / No Received Within Temperature Range (2-6°C): <input checked="" type="radio"/> Yes / No Sample Preservative: Ice / None / Acid / Other																							

wo # 619

eANALYTICS: Environmental testing made Easy

Page 1 of 1

eAnalytics Laboratory

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Client: LT Environmental / Anadarko Lab ID: 619
 Project: Equinox 9-9, 15-9
 Analysis: Volatile Organics Method: EPA8260
 TPH-GRO / DRO / ORO EPA8260/8015

Sample Name	Benzene mg/kg	Toluene mg/kg	Ethyl- benzene mg/kg	Total Xylenes mg/kg	TPH GRO C6-C10 mg/kg	TPH DRO C10-C28 mg/kg	TPH ORO C28-C36 mg/kg	Date	Date	Lab ID
								Sampled	Analyzed	
N01 @ 2'	< 0.01	< 0.01	< 0.01	0.021	< 50	< 50	< 50	01/20/14	01/20/14	619 1
E01 @ 2'	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	01/20/14	01/20/14	619 2
S01 @ 2'	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	01/20/14	01/20/14	619 3
W01 @ 2'	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	01/20/14	01/20/14	619 4
B01 @ 2.5'	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	01/20/14	01/20/14	619 5



Client: LT Environmental / Anadarko Lab ID: 619
 Project: Equinox 9-9, 15-9
 Analysis: pH Method: EPA9045D
 EC USDA 60 (3)

Sample Name	pH	EC	Date	Date	Lab ID
	su	mmhos/cm	Sampled	Analyzed	
N01 @ 2'	6.89	1.08	01/20/14	01/20/14	619 1
E01 @ 2'	6.94	0.636	01/20/14	01/20/14	619 2
S01 @ 2'	7.12	0.696	01/20/14	01/20/14	619 3
W01 @ 2'	7.08	0.619	01/20/14	01/20/14	619 4
B01 @ 2.5'	7.06	0.691	01/20/14	01/20/14	619 5

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Client: LT Environmental / Anadarko Lab ID: 619
 Project: Equinox 9-9, 15-9 Method: EPA8260

Sample Name	Dibromo- fluoromethane % Recovery	1,2 Dichloro- ethane-D4 % Recovery	Toluene-D8 % Recovery	Bromo- fluorobenzene % Recovery	Date Sampled	Date Analyzed	Lab ID
N01 @ 2'	99	89	105	101	01/20/14	01/20/14	619 1
E01 @ 2'	93	96	90	94	01/20/14	01/20/14	619 2
S01 @ 2'	95	103	100	102	01/20/14	01/20/14	619 3
W01 @ 2'	98	97	92	101	01/20/14	01/20/14	619 4
B01 @ 2.5'	94	93	89	86	01/20/14	01/20/14	619 5



Client: LT Environmental / Anadarko Lab ID: 619
 Project: Equinox 9-9, 15-9
 Analysis: Volatile Organics Method: EPA8260
 TPH-GRO / DRO / ORO EPA8260/8015

Sample Name	Benzene % Rec	Toluene % Rec	Ethyl- benzene % Rec	Total Xylenes % Rec	TPH GRO C6-C10 % Rec	TPH DRO C10-C28 % Rec	TPH ORO C28-C36 % Rec	Date Analyzed	Lab ID	
Laboratory Control (70-130%)	91	103	98	103	98	97	97	01/20/14	LCS	619 1
Calibration Verification (80-120%)	101	102	92	102	97	101	104	01/20/14	CCV	619 1
Method Blank	< 0.01 mg/kg	< 0.01 mg/kg	< 0.01 mg/kg	< 0.01 mg/kg	< 50 mg/kg	< 50 mg/kg	< 50 mg/kg	01/20/14	MB	619 1

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