



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

April 29, 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
Castor Hanson Unit True 1, Magness Land 15-25
COGCC Spill Tracking No. 2147690
SESE 25-T3N-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 February 7, 2014, for the Castor Hanson Unit True 1, Magness Land 15-25 tank battery (Site). We are requesting a No Further Action (NFA) status for this Site.

On January 28, 2014, an equipment failure caused approximately 1 barrel of condensate to release from the production tank. The condensate misted onto the snow covered ground of the production facility and lease road, which are located adjacent to the South Platte River. The wells were shut in. An earthen berm was constructed around the spray release area to prevent any condensate from potentially migrating offsite with melting snow. Absorbent booms were placed between the earthen berm and the South Platte River as an additional precautionary measure. The remaining fluid was transferred from the failed production tank to another production facility.

Kerr-McGee contracted LT Environmental, Inc. (LTE) to collect surface water samples from the South Platte River, soil samples from the spray release area, and interpret the laboratory analytical results. Four surface water samples (SW01 through SW04) were collected from the South Platte River on the day of the release and submitted for benzene, toluene, ethylbenzene and total xylenes (BTEX) analysis by Environmental Protection Agency (EPA) Method 8260. The surface water sample analytical results indicate that BTEX concentrations in the surface water are below the laboratory reporting limit of 1.0 micrograms per liter (µg/L). Surface soil samples could not be collected on the day of the release due to the presence of snow on the ground. The initial spill response actions and surface water sample results summarized above were submitted to the Colorado Oil and Gas Conservation Commission (COGCC) via Form 19 on February 7, 2014.

On February 28, 2014, following submittal of the Form 19 and following snow melt, nine surface soil samples (SS01 through SS09) were collected from within the spray release area to assess the lateral extent of petroleum hydrocarbon impacted soil, if present. The surface soil samples were

submitted for total petroleum hydrocarbon (TPH) analysis by EPA Methods 8015 and 8260 and BTEX analysis by EPA Method 8260. The soil sample analytical results confirm that TPH and BTEX concentrations are below COGCC allowable levels within the spray release area. As a precautionary measure, approximately 130 cubic yards of soil were excavated from the release area and transported to the Front Range Landfill in Erie, Colorado for disposal.

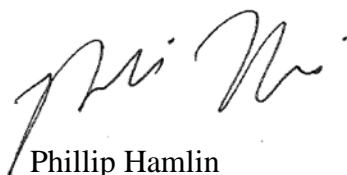
A Site Map showing the general site layout, surface soil sample locations, and surface water sample locations is provided as Figure 1. The surface water sample and soil sample analytical results are summarized in Tables 1 and 2, respectively. The laboratory analytical reports are attached.

No further investigation is required at this site. Laboratory results for the surface water samples indicate that BTEX concentrations in the surface water are below the laboratory reporting limit of 1.0 µg/L. Laboratory results for the surface soil samples confirm that TPH and BTEX concentrations are below COGCC allowable levels within the release area. Based on the surface water sample and surface soil sample analytical results, Kerr-McGee is requesting a No Further Action status for this site.

Feel free to contact me at 970-515-1161 if you have any questions regarding this information.

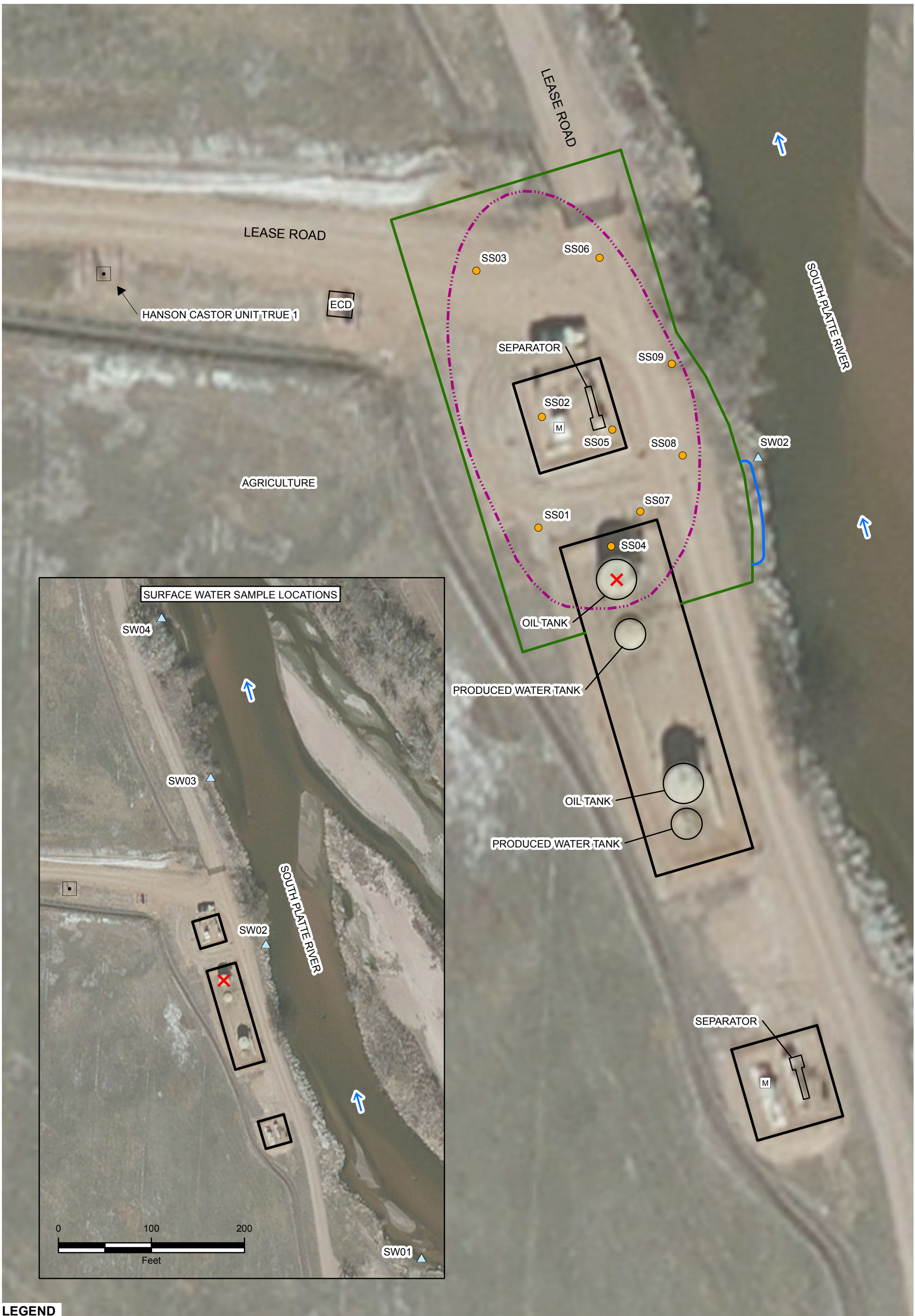
Sincerely,

Kerr-McGee Oil & Gas Onshore LP

A handwritten signature in black ink, appearing to read 'Phillip Hamlin', is written over a horizontal line.

Phillip Hamlin
Senior HSE Representative

Attachments



LEGEND

- | | | | |
|---|------------------------------|-------|------------------------------|
| ✖ | RELEASE | — | EMERGENCY EARTHEN BERM |
| ● | SOIL SAMPLE | — | ABSORBENT BOOM |
| ▲ | SURFACE WATER SAMPLE | - - - | SPRAY RELEASE EXTENT |
| ■ | WELLHEAD | □ | BERM |
| M | METER HOUSE | | ECD: EMISSION CONTROL DEVICE |
| ↑ | SURFACE WATER FLOW DIRECTION | | |

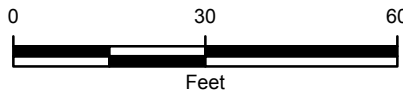


FIGURE 1
SITE MAP
CASTOR HANSON UNIT TRUE 1, MAGNESS LAND 15-25
SESE SEC 25-T3N-R67W
WELD COUNTY, COLORADO
KERR-MCGEE OIL & GAS ONSHORE LP



TABLE 1
SURFACE WATER ANALYTICAL RESULTS
CASTOR HANSON UNIT TRUE 1, MAGNESS LAND 15-25
WELD COUNTY, COLORADO
KERR-MCGEE OIL & GAS ONSHORE LP

Sample Name	Date	Benzene (ug/L)	Toluene (ug/L)	Ethyl-benzene (ug/L)	Xylenes (ug/L)
SW01	01/28/2014	<1.0	<1.0	<1.0	<1.0
SW02	01/28/2014	<1.0	<1.0	<1.0	<1.0
SW03	01/28/2014	<1.0	<1.0	<1.0	<1.0
SW04	01/28/2014	<1.0	<1.0	<1.0	<1.0

Notes: < - less than
ug/L - micrograms per Liter
NA - Not Analyzed/Not Available



TABLE 2
SOIL SAMPLE ANALYTICAL RESULTS
CASTOR HANSON UNIT TRUE 1, MAGNESS LAND 15-25
WELD 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)
SS01	Surface	02/28/2014	<0.01	0.177	0.027	0.376	<50	<50	<50
SS02	Surface	02/28/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50
SS03	Surface	02/28/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50
SS04	Surface	02/28/2014	0.027	2.18	0.681	12.3	<50	122	<50
SS05	Surface	02/28/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50
SS06	Surface	02/28/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50
SS07	Surface	02/28/2014	<0.01	0.047	<0.01	0.061	<50	<50	<50
SS08	Surface	02/28/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50
SS09	Surface	02/28/2014	<0.01	<0.01	<0.01	<0.01	<50	<50	<50
COGCC Standards			0.17	85	100	175	500*	500*	500*

Notes: bgs - below ground surface

< - less than

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.

COGCC - Colorado Oil and Gas Conservation Commission



Test Report



January 28, 2014

Client: LT Environmental / Anadarko

Project: Hanson Castor True #1

Lab ID: 667

Date Samples Received: 1/28/2014

Number of Samples: 4

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,

A handwritten signature in black ink, appearing to read "Chris Dieken".

Christopher Dieken
Quality Assurance Manager

A handwritten signature in black ink, appearing to read "Todd Rhea".

Todd Rhea
Laboratory Manager



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(DoD ELAP)

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Chain of Custody

eANALYTICS
LABORATORY

Chain of Custody Form

[illegible]

WO # 667

eANALYTICS: Environmental testing made Easy

Page of

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The results contained within this report relate only to the items analyzed

eANALYTICS
LABORATORY

Client: LT Environmental / Anadarko

Lab ID: 667

Project: Hanson Castor True #1

Analysis: Volatile Organics

Method: EPA8260

Sample Name	Benzene	Toluene	Ethyl- benzene	Total Xylenes	Date Sampled	Date Analyzed	Lab ID	
	ug/L	ug/L	ug/L	ug/L				
SW01	< 1.0	< 1.0	< 1.0	< 1.0	01/28/14	01/28/14	667	1
SW02	< 1.0	< 1.0	< 1.0	< 1.0	01/28/14	01/28/14	667	2
SW03	< 1.0	< 1.0	< 1.0	< 1.0	01/28/14	01/28/14	667	3
SW04	< 1.0	< 1.0	< 1.0	< 1.0	01/28/14	01/28/14	667	4

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eANALYTICS
L A B O R A T O R Y

Client: LT Environmental / Anadarko

Lab ID: 667

Project: Hanson Castor True #1

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
SW01	87	99	104	107	01/28/14	01/28/14	667 1
SW02	101	102	100	100	01/28/14	01/28/14	667 2
SW03	87	103	98	103	01/28/14	01/28/14	667 3
SW04	91	105	88	104	01/28/14	01/28/14	667 4

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eANALYTICS
LABORATORY

Client: LT Environmental / Anadarko

Lab ID: 667

Project: Hanson Castor True #1

Analysis: Volatile Organics

Method: EPA8260

Sample Name	Benzene	Toluene	Ethyl- benzene	Total Xylenes	Date Analyzed	Lab ID	
	% Rec	% Rec	% Rec	% Rec			
Laboratory Control	102	101	90	103	01/28/14	LCS	667 1
(70-130%)							
Calibration Verification	103	91	101	103	01/28/14	CCV	667 1
(80-120%)							
Method Blank	< 1.0	< 1.0	< 1.0	< 1.0	01/28/14	MB	667 1
	ug/L	ug/L	ug/L	ug/L			

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Test Report



March 2, 2014

Client: LT Environmental / Anadarko

Project: Hanson Caster True #1

Lab ID: 831

Date Samples Received: 2/28/2014

Number of Samples: 9

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,

A handwritten signature in black ink, appearing to read "Chris Dieken".

Christopher Dieken
Quality Assurance Manager

A handwritten signature in black ink, appearing to read "Todd Rhea".

Todd Rhea
Laboratory Manager



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(DoD ELAP)

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Chain of Custody

eANALYTICS

L A B O R A T O R Y

Chain of Custody Form

eANALYTICS LABORATORY			1767 Rocky Mountain Avenue Loveland CO 80538 Phone: (970) 667-6975 Fax: (970) 669-0941 www.eAnalyticsLab.com												
CLIENT INFORMATION (*New Clients please fill out completely)			ANALYSIS INFORMATION (Select analysis by checking box on corresponding sample line)												
Company: LT Environmental			Number of Containers	Matrix: (S) Soil (W) Water (V) Vapor (O) Other	BTEX (EPA 8260)	BTEX Naphthalene (EPA 8260)	TPH - GRO/DRO (EPA 8260/8015)	TPH-GRO/DRO/ORO (EPA 8260/8015)	SAR (US Dept of Ag Method 20B)	EC (US Dept of Ag Method 3)	pH (EPA 9045D)	Other Analysis			
Project: Hanson Caster true #1															
Project Manager: J. Crockett															
Sampler: J. Dockter															
Phone/Email: 303-433-9788															
Address: 4600 W 60th Ave Arvada, CO 80003															
Lab ID	Sample Name	Sampling Date/Time													
1	SS01	2/28/14 1555 AM / PM	1	S	X			X							
2	SS02	1600 AM / PM													
3	SS03	1605 AM / PM													
4	SS04	1610 AM / PM													
5	SS05	1615 AM / PM													
6	SS06	1620 AM / PM													
7	SS07	1625 AM / PM													
8	SS08	1630 AM / PM													
9	SS09	1635 AM / PM													
		AM / PM													
		AM / PM													
		AM / PM													
		AM / PM													
		AM / PM													
		AM / PM													
		AM / PM													
Comments:															
Turnaround Time (Business Days) TAT begins when sample is received by eANALYTICS <input type="radio"/> Normal (5-10 Days) <input type="radio"/> 3 Day (1.25x) <input type="radio"/> 1 Day (2x) <input type="radio"/> Same Day (3x) <input checked="" type="radio"/> Next Bus. Morning (APC Pricing)					Record of Custody Relinquished by: <i>[Signature]</i> Company: <i>LTE</i> Received by: _____ Company: _____					Date: 2/28/14 Time: 4:30 AM / PM					
For eANALYTICS Use Samples Received Intact <input checked="" type="radio"/> Yes <input type="radio"/> No Received Within Temperature Range (2-6°C) <input checked="" type="radio"/> Yes <input type="radio"/> No Sample Preservative <input checked="" type="radio"/> Ice <input type="radio"/> None <input type="radio"/> Acid <input type="radio"/> Other					Relinquished by: _____ Company: _____ Received by: <i>[Signature]</i> Company: eANALYTICS					Date: 2-28-14 Time: 4:30 AM / PM					

WO # 831

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eANALYTICS

LABORATORY

Client: LT Environmental / Anadarko

Lab ID: 831

Project: Hanson Caster True #1

Analysis: Volatile Organics
TPHMethod: EPA8260
EPA8260/8015

Sample Name								Date Sampled	Date Analyzed	Lab ID	
					TPH GRO	TPH DRO	TPH ORO				
	Benzene	Toluene	Ethyl- benzene	Total Xylenes	C6-C10	C10-C28	C28-C36				
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg				
SS01	< 0.01	0.177	0.027	0.376	< 50	< 50	< 50	02/28/14	02/28/14	831	1
SS02	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	02/28/14	831	2
SS03	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	02/28/14	831	3
SS04	0.027	2.18	0.681	12.3	122	< 50	< 50	02/28/14	02/28/14	831	4
SS05	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	02/28/14	831	5
SS06	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	02/28/14	831	6
SS07	< 0.01	0.047	< 0.01	0.061	< 50	< 50	< 50	02/28/14	02/28/14	831	7
SS08	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	02/28/14	831	8
SS09	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	02/28/14	831	9

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eANALYTICS
L A B O R A T O R Y

Client: LT Environmental / Anadarko

Lab ID: 831

Project: Hanson Caster True #1

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
SS01	89	97	109	89	02/28/14	02/28/14	831 1
SS02	91	91	95	111	02/28/14	02/28/14	831 2
SS03	90	87	109	88	02/28/14	02/28/14	831 3
SS04	95	93	91	101	02/28/14	02/28/14	831 4
SS05	108	88	109	107	02/28/14	02/28/14	831 5
SS06	102	96	89	86	02/28/14	02/28/14	831 6
SS07	105	95	106	109	02/28/14	02/28/14	831 7
SS08	95	88	96	96	02/28/14	02/28/14	831 8
SS09	107	110	89	99	02/28/14	02/28/14	831 9

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LABORATORY

Client: LT Environmental / Anadarko

Lab ID: 831

Project: Hanson Caster True #1

Analysis: Volatile Organics
TPHMethod: EPA8260
EPA8260/8015

Sample Name	Benzene	Toluene	Ethyl- benzene	Total Xylenes	TPH GRO C6-C10	TPH DRO C10-C28	TPH ORO C28-C36	Date Analyzed	Lab ID	
	% Rec	% Rec	% Rec	% Rec	% Rec	% Rec	% Rec			
Laboratory Control Sample	91	90	98	104	103	100	100	02/28/14	LCS	831 1
(70-130%)										
Method Blank	< 0.01	< 0.01	< 0.01	< 0.01	< 50	< 50	< 50	02/28/14	MB	831 1
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg			

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