



Kerr-McGee Oil & Gas Onshore LP  
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December 18, 2015

Mr. Chris Binschus  
Colorado Oil & Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Re: COGCC Inspection Corrective Actions  
Gee 15C-25HZ Well Pad  
COGCC Document Number 682400045

Dear Mr. Binschus:

Kerr-McGee Oil and Gas Onshore, LP (Kerr-McGee) submits this response to COGCC Document Number 682400045 regarding the October 29, 2015 inspection at the Gee 15C-25HZ well pad (COGCC Location ID 436543).

Kerr-McGee was granted a verbal 45 day extension on November 19, 2015 for the completion of the corrective actions detailed in the subject document. Form 4 Document Number 400938081 was submitted to confirm the extension. All required action items have been completed or are in the process of being completed, as noted in our responses below.

#### **COGCC Action Item**

*Submit a Form 4 attached with a start date for interim reclamation, describe on a map where the topsoil stockpile is located and the amount of topsoil, and a weed management plan by Corrective Action date of November 16, 2015.*

#### **Kerr-McGee Response**

Interim reclamation activities at the Gee 15C-25HZ well pad commenced on November 23, 2015. Kerr-McGee's reclamation contractor will deep rip the soil to a minimum depth of 18 inches to alleviate soil compaction. The contractor will then prepare the soil to create an adequate seed bed for planting. Kerr-McGee is currently in discussions with the surface owner to determine the appropriate seed mixture to be planted in the disturbance area associated with the well pad. Upon completion of the seeding, the location will be straw mulched and crimped using a certified weed free straw.

During initial construction of the well pad, Kerr-McGee encountered shallow groundwater/saturated soil. Due to construction concerns, topsoil was left in place to properly support the structural requirements of the drilling activities. As a best management practice, Kerr McGee will establish depth to groundwater on future projects prior to the commencement of construction activities if the potential for shallow groundwater is suspected.

Kerr-McGee will control weeds at the Gee 15C-25HZ well pad to the standards defined in Rule 1003. Kerr-McGee will also conduct monthly inspections of the reclaimed area until all applicable reclamation standards have been met. The inspector will document undesirable species and noxious weeds encountered on the location. For inspections requiring follow-up weed control, Kerr-McGee will utilize the most appropriate weed control method (herbicides, mechanical, etc.) to manage the undesirable species and noxious weeds present on the location.

Kerr-McGee will submit a Form 4 Sundry Notice for the Gee 15C-25HZ well pad once 1003 Reclamation Standards have been met.

#### **COGCC Action Item**

*Production areas need to be stabilized along perimeter of well pad by Corrective Action date of November 20, 2015. Sediment movement and erosion needs to be controlled to minimize transport of sediment offsite, and site degradation. Refer to Photo 5 in Doc. #682400047.*

#### **Kerr-McGee Response**

The COGCC and Kerr-McGee conducted a site visit at the Gee 15C-25HZ well pad on November 12, 2015. This well pad was constructed and stabilized with plating material and road base. A perimeter stormwater control was installed around the well pad. The installed stormwater control prevented any sediment from being transported off site. It was discussed during the site visit that the negligible erosion located along the perimeter of the pad was not causing site degradation.

#### **COGCC Action Item**

*One (1) large pile of road base located in southeastern location needs to be removed by Corrective Action date of November 20, 2015.*

#### **Kerr-McGee Response**

The stockpile of road base on the well pad was within the site perimeter stormwater control. During the November 12, 2015 site visit, it was discussed that Kerr-McGee could use the road base for future production operations and the stockpile would be removed once interim reclamation operations commence.

**COGCC Action Item**

*Canada thistle (Cirsium arvense) and Musk thistle (Carduus nutans) are present on location. Both are Colorado State "List B" noxious weeds and need to be removed by Corrective Action date of November 20, 2015 and monitored/managed in future growing seasons. Refer to photos in Doc. #682400047.*

*Kochia (Kochia sp.) and Russian thistle (Salsola sp.) exists throughout location. This is debris and will break off and encroach upon adjacent lands. Remove and dispose of properly by Corrective Action date of November 20, 2015. Refer to photos in Doc. #682400047.*

**Kerr-McGee Response**

The noxious weeds that were present on the perimeter of the Gee 15C-25HZ well pad were sprayed with herbicide on November 19, 2015.

The undesirable species, Kochia (Kochia sp.) and Russian thistle (Salsola sp.), located along the perimeter of the well pad were controlled utilizing mechanical means on December 10, 2015. Mechanical control will aid in preventing encroachment on to adjacent lands.

Feel free to contact me at 970-515-1431 if you have any questions regarding this information.

Sincerely,

Kerr-McGee Oil & Gas Onshore LP



Paul Schwarz  
HSE Representative

cc: Ms. Margaret Ash, COGCC