



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 16N-25HZ Well Pad
COGCC Document Number 682400048

Dear Mr. Binschus:

Kerr-McGee Oil and Gas Onshore, LP (Kerr-McGee) submits this response to COGCC Document Number 682400048 regarding the October 29, 2015 inspection at the Gee 16N-25HZ well pad (COGCC Location ID 436708).

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 400938095 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 16N-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 16N-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 16N-25HZ well pad once 1003 Reclamation Standards have been met.

COGCC Action Item

Canada thistle (Cirsium arvense), a Colorado State "List B" noxious weed, is present on location. Noxious weeds need to be removed by Corrective Action date of November 20, 2015 and monitored/managed in future growing seasons. Refer to photos in Doc. #682400051.

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. #682400051.

Kerr-McGee Response

The noxious weeds that were present on the perimeter of the Gee 16N-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