



Kerr-McGee Oil & Gas Onshore LP
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December 31, 2015

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

Re: COGCC Inspection Corrective Actions
HSR-Conley 11-36A Flowline Disturbance
COGCC Document Number 682400084

Dear Mr. Binschus:

Kerr-McGee Oil and Gas Onshore, LP (Kerr-McGee) submits this response to COGCC Document Number 682400084 regarding the November 18, 2015 inspection at the HSR-Conley 11-36A flowline disturbance (COGCC Location ID 327882).

A Reclamation Plan for the referenced flowline disturbance area with the requested information is attached to this letter.

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

Sincerely,

Kerr-McGee Oil & Gas Onshore LP

A handwritten signature in blue ink, appearing to read 'PS' followed by a stylized flourish.

Paul Schwarz
HSE Representative

Attachment – HSR-Conley 11-36A Flowline Disturbance Reclamation Plan

KERR-MCGEE RECLAMATION PLAN

FLOWLINE DISTURBANCE ASSOCIATED WITH

COGCC LOCATION ID #'s 327882 AND 438023

Site Description

A flowline disturbance area associated with COGCC Location ID #'s 327882 and 438023 was inspected on December 2, 2015, by H2 Enterprises (H2) to assess vegetation conditions and to establish a plan for controlling longspine sandbur (*Cenchrus longispinus*) species that are prevalent in the disturbed area and adjacent properties. The inspected disturbed area is located in NESW Sec 36, T4N, R66W in Weld County, Colorado (Figure 1). The estimated disturbance area is approximately 11.0 acres. The current land use of the location is dryland pasture.

Sandbur Management Plan

The following management procedures have been identified to alleviate the sandbur population at the location.

1. Mow the location, as soon as weather conditions allow, to a height of approximately four to six inches above ground surface to ensure the majority of the seed is removed from plant stems.
2. Following mowing operations, collect clippings and seed to capture and remove seeds from the location to prevent further establishment. Seed removal methods may include a mower attached lawn vacuum or sweeping the location post mowing activities with a fastening material such as burlap or old carpet to attach and remove residual seed from the location.
3. As soon as conditions allow, drill seed the location with the seed mixture in Table 1 to provide competition for residual sandbur seed during spring emergence. This seed mixture, derived from the surface owner's requested seed mixture, contains grass species that are Plateau™ tolerant.
4. The disturbance area will be inspected on a weekly basis during the active 2016 and 2017 growing seasons to document the emergence of sandbur seedlings for further management and control efforts. Upon emergence of sandbur seedlings, the location will be sprayed with Plateau™ to further aid in the control of sandbur establishment. Herbicide application timing and rates will follow the manufacturer's recommendations as stated on the herbicide label.
5. Seed the location in the fall with the surface owner requested perennial grass, native range seed mixture that is provided in Table 2. This seed mixture is suitable for reclamation efforts in sandy soils. Seeding should be conducted using a drill seeder capable of direct seed placement in coarse textured soils. Seed depth is critical for most native range species. It is recommended that the seed be placed no deeper than ½ inch. The recommended seed mixture provides approximately 60 pure live seeds (PLS) per square foot.

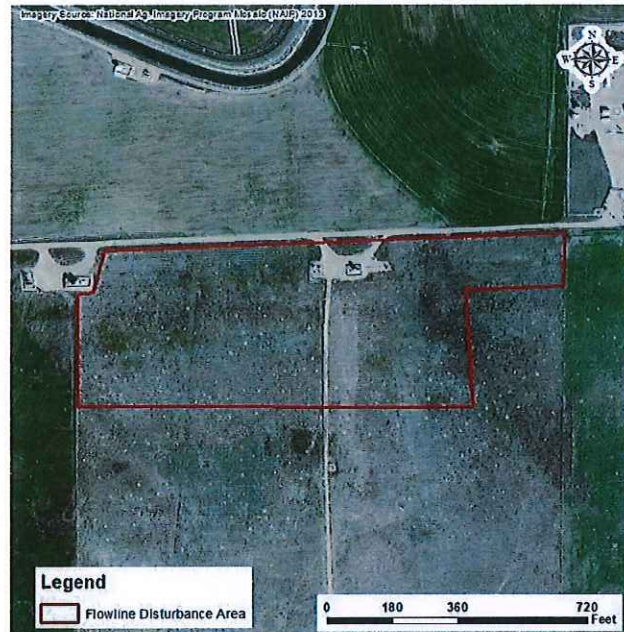


Figure 1. Aerial image of the flowline disturbance area.

Weed Management Plan

Kerr-McGee will continue to control weeds at the disturbed location to the standards defined in Rule 1003. Kerr-McGee will also conduct monthly inspections of the reclaimed disturbance area until all applicable reclamation standards have been met. Inspectors 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 continue to manage the undesirable species and noxious weeds present on the location.

Kerr-McGee will submit a Form 4 Sundry Notice for COGCC Location ID #'s 327882 and 438023 once 1003 Reclamation Standards have been met.

Interim Stormwater Controls

The current stand of vegetation will be mowed to a height of approximately four to six inches above ground surface. The existing foliar vegetative cover and root mass are currently stabilizing the soil and will prevent erosion from occurring. In areas with less than approximately 20 percent total foliar cover, a certified weed free straw mulch will be crimped in place to stabilize the soil and prevent erosion. The final stabilization of the disturbance area will be considered complete upon the establishment of the vegetation that will be seeded per the landowner's specified seed mixture (noted in Table 2), thus satisfying the COGCC 1003 series Rules.

Seed Mixtures

Table 1. Preliminary seed mixture of Plateau™ tolerant species.

Common Name	Scientific Name	# PLS/acre	PLS/acre	PLS/sq ft	% of Mix
Western Wheatgrass	<i>Pascopyrum smithii</i>	4.8	522,720	12.0	20%
Intermediate Wheatgrass	<i>Thinopyrum intermedium</i>	6.6	522,720	12.0	20%
Sideoats Grama	<i>Bouteloua curtipendula</i>	2.7	522,720	12.0	20%
Prairie Sandreed	<i>Calamovilfa longifolia</i>	1.9	522,720	12.0	20%
Slender Wheatgrass	<i>Elymus trachycaulus</i>	3.3	522,720	12.0	20%
Total	--	19.3	2,613,600	60.0	100%

Table 2. Surface owner requested permanent seed mixture for the flowline disturbance area.

Common Name	Scientific Name	# PLS/acre	PLS/acre	PLS/sq ft	% of Mix
Western Wheatgrass	<i>Pascopyrum smithii</i>	3.6	392,040	9.0	15%
Intermediate Wheatgrass	<i>Thinopyrum intermedium</i>	5.0	392,040	9.0	15%
Sideoats Grama	<i>Bouteloua curtipendula</i>	2.1	392,040	9.0	15%
Sand Dropseed	<i>Sporobolus cryptandrus</i>	0.07	392,040	9.0	15%
Prairie Sandreed	<i>Calamovilfa longifolia</i>	1.0	261,360	6.0	10%
Little Bluestem	<i>Schizachyrium scoparium</i>	1.0	261,360	6.0	10%
Sandberg Bluegrass	<i>Poa secunda</i>	0.28	261,360	6.0	10%
Slender Wheatgrass	<i>Elymus trachycaulus</i>	1.6	261,360	6.0	10%
Total	--	14.5	2,613,600	60.0	100%