



August 19, 2020

Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

**Re: Request for 502.b Variance
Rule 1004 Final Reclamation of Access Road to HSR-Stubben 11-26A
Location ID: 327214**

Dear Director:

Pursuant to Commission Rule 1004, Kerr-McGee Oil & Gas Onshore, LP (KMOG) respectfully submits this request to be relieved from its obligation to comply with specific provisions of Rule 1004 for the HSR-Stubben 11-26A well site (Location ID: 327214) NESW 26-3N-66W, Weld County, CO (hereafter "Request"). KMOG has an agreement with the surface owner Bradley Beierle ("Landowner") to leave the access road in the current grade and contour for the Landowner's personal and agricultural use.

KMOG seeks relief from the requirements of Rule 1004.a, and .c (2), of the access road shall not be required if the operator can demonstrate to the Director's or the Commission's satisfaction that compliance with such rules is not necessary to protect the public health, safety and welfare, including prevention of significant adverse environmental impacts, and that the operator has entered into an agreement with the surface owner regarding topsoil protection and reclamation of the land.

Specific to certain provisions of the 1000 series for Reclamation Regulations, KMOG has performed re-contouring and associated reclamation and maintenance activities on the tank battery, flow line corridor and well site for non-crop, rangeland locations.

Background

The HSR-Stubben 11-26A well was plugged and abandoned January 2, 2020 ("Well Site"), and subsequent reclamation activities began shortly thereafter on the well site and flowline removal disturbance areas. In the process of reclamation, road base was removed where necessary, and compaction relief, soil amendments, seed bed preparation, seeding and stabilization completed, as to be returned to rangeland per the Landowner's request. Landowner requested that the access road be left in place for stabilized access to portions of the surface property, and due to sandy soil conditions, it would provide a stable surface to reduce potential erosion and rutting from Landowner's vehicle. All waste and debris related to oil and gas have been removed from the Well Site, tank battery location and access road ("Site"), and all equipment was removed. The access road has been used as an auxiliary access point to the property and is connected to the central arterial access road to the well sites of the HSR-Fogelman 6-26A, HSR-Russell 3-26, and HSR Beierle 14-26, which is included in a separate variance submittal (HSR-Russell 3-26 Submitted Variance, Doc # 402484953). The use of the access road is beneficial to the Landowner for continued stabilized property access; retention for the benefit of the Landowner's use does not adversely affect public health, safety, welfare, and the environment.

Agreement

The attached letter agreement (Appendix A: Reclamation Waiver and Release) between the Landowner and KMOG satisfies all the requirements of Rule 1001.c and the associated Operator Guidance. Among other things, it describes the area covered by the waiver, explains the reason for the waiver, acknowledges that the Landowner finds the current grade and contour of the area satisfactory and are knowingly waiving their right to additional reclamation. As the agreement explains, the Landowner has waived further reclamation because the Landowner wants to use the access road for personal use and they believe that the current site condition is consistent with their intended property access, intent to reduce erosion potential and improved rangeland use of the area.

Public Health, Safety, Welfare, and the Environment

The requested variance will protect public health, safety, and welfare and will prevent significant adverse environmental impacts for the following reasons:

Updated 8/19/2020

1. **Well:** The well was plugged and abandoned on January 2, 2020 and an abandonment report Form 6, (Document Number 402289541) was submitted by KMOG on January 20, 2020 (Appendix B: COGCC Forms (Submitted)).
2. **Remediation:** There have not been Remediation projects on the HSR-Stubben 11-26A location.
3. **Equipment:** All oil and gas production equipment has been removed by KMOG. An initial Form 27 was submitted at the sump removal (Document Number: 402234805) and when no historically impacted soils were found, a supplemental Form 27 was submitted (Document Number: 402295502). (Appendix B: COGCC Forms (Submitted))
4. **Debris:** All trash and debris associated with oil and gas activities were removed from the Site. (Appendix C: Photolog).
5. **Noxious Weeds:** In the subsequent time post reclamation efforts, the Site is progressing to be returned to rangeland to the extent that it meets the standards as specified in the 1000 Series Rules. KMOG will continue to monitor and control noxious weeds until achieving final reclamation threshold for release. Weed control measures employed will include mowing and herbicide treatment during the appropriate growing season and ongoing noxious weed monitoring to measure success of treatments. (Appendix C: Photolog)
6. **Surface Owner/Landowner Consultation:** The Landowner intends to continue to use the access road for stabilized land access. The Landowner is aware and approves of the reclamation conducted to date and the remaining limited reclamation – specifically the weed treatment. Except for the access road, the HSR-Stubben 11-26A is in progress to satisfy the provisions listed in the 1000 Series Rules for final reclamation of well sites. For these reasons and per the Landowner's requests, KMOG will not be able to comply with the rules as specified in Rule 1003.e. (2) as indicated in Rule 1004 to re-contour the site to surrounding grade. The Landowner has specifically requested that no further re-contouring action or removal of the access road be taken for continued stabilized property access. (Appendix A: Reclamation Waiver and Release).
7. **Current Condition:** The Well Site, flow line corridor and former tank battery have had compaction relief, soil amendments applied, seed bed preparation, seeded, stabilized and returned to rangeland use. The access road is stabilized with road base and is being used as an auxiliary access road connected to the central access road through the property (APPENDIX C: PHOTOLOG).
8. **Stabilization and Stormwater:** The access road will remain in place and is compacted, stabilized, and in good working order. The Well Site, flow line corridor and former tank battery location are stabilized with straw, and annual and perennial vegetation are present. At the time of inspection, no erosion issues were observed. (APPENDIX D: Stormwater Inspection)
9. **Public Health, Safety, and Welfare Protection and Significant Environmental Impact Prevention:** Compliance with certain provisions contained in Rule 1004.a is deemed unnecessary to protect the public health, safety and welfare, including prevention of significant adverse environmental impacts, due to the following factors (Figure 1-Site Maps):
 - The access road is not located in a floodplain.

- The access road is surrounded by vegetated rangeland on all sides.
- The access road is stabilized with road base, minimizing erosion to the satisfaction of the Landowner. The Well Site and former tank battery location areas are stabilized with straw, and annual and perennial vegetation are present.
- The closest residence is 1575' to the south of the access road.
- The nearest water source is the Speer Canal, which is 2135' to the east of the access road.
- The access road, tank battery location and Well Site are not located within a Colorado Parks and Wildlife designated Sensitive Wildlife Habitat or Restricted Surface Occupancy areas per the COGCC web-based GIS server. (Figure 1-Site Maps)

Conclusion

As described above, the access road currently in use by the Landowner for stabilized property access to reduce potential erosion and rutting. The use of this area is beneficial to the Landowner and does not adversely affect public health, safety, welfare, and the environment nor violate the basic intent of the Oil and Gas Conservation Act.

For the reasons set forth above, KMOG respectfully requests a variance from the remaining final reclamation requirements for the HSR-Stubben 11-26A oil and gas well location. With the exception of the access road, the HSR-Stubben 11-26A location satisfies the provisions listed in the 1000 Series Rules for final reclamation of well sites, which include efforts to-date that have been made to reclaim the site, the ongoing efforts to monitor and control noxious weeds, and most importantly the wishes of the Landowner.

If you have questions or require additional information, please contact me at 970-515-1627 or kate_graves@oxy.com.

Respectfully,



Kate Graves

Advisor HSE Ops
Kerr-McGee Oil & Gas Onshore, LP

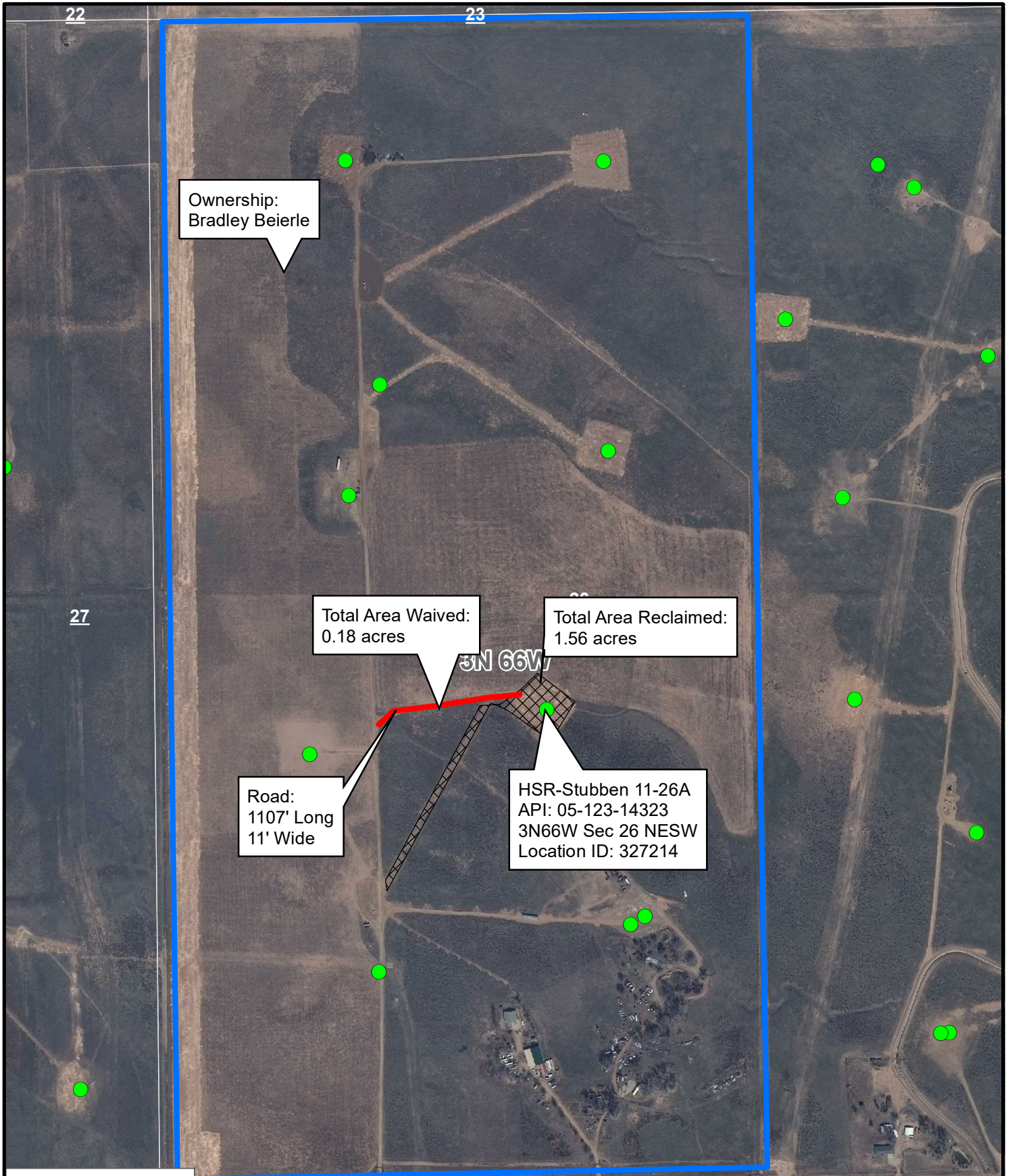
Attachments:

1. Figure 1 – Site Map: Ownership and Waived Area, Watershed, RSO, SWA, Hydrology Features
2. Appendix A – Reclamation Waiver and Release
3. Appendix B – Associated Well COGCC Forms (Submitted)
4. Appendix C-Photolog
5. Appendix D- Stormwater Inspection

Cc w/attachments:

Chris Binschus

Figure 1 -Site Maps: Ownership, Area Waived, RSO and Watershed, SWA, Hydrology



Ownership:
Bradley Beierle

Total Area Waived:
0.18 acres

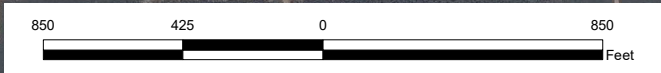
Total Area Reclaimed:
1.56 acres

Road:
1107' Long
11' Wide

HSR-Stubben 11-26A
API: 05-123-14323
3N66W Sec 26 NESW
Location ID: 327214

Legend

- COGCC Wells
- Ownership
- Area to be Waived
- Reclaimed Area

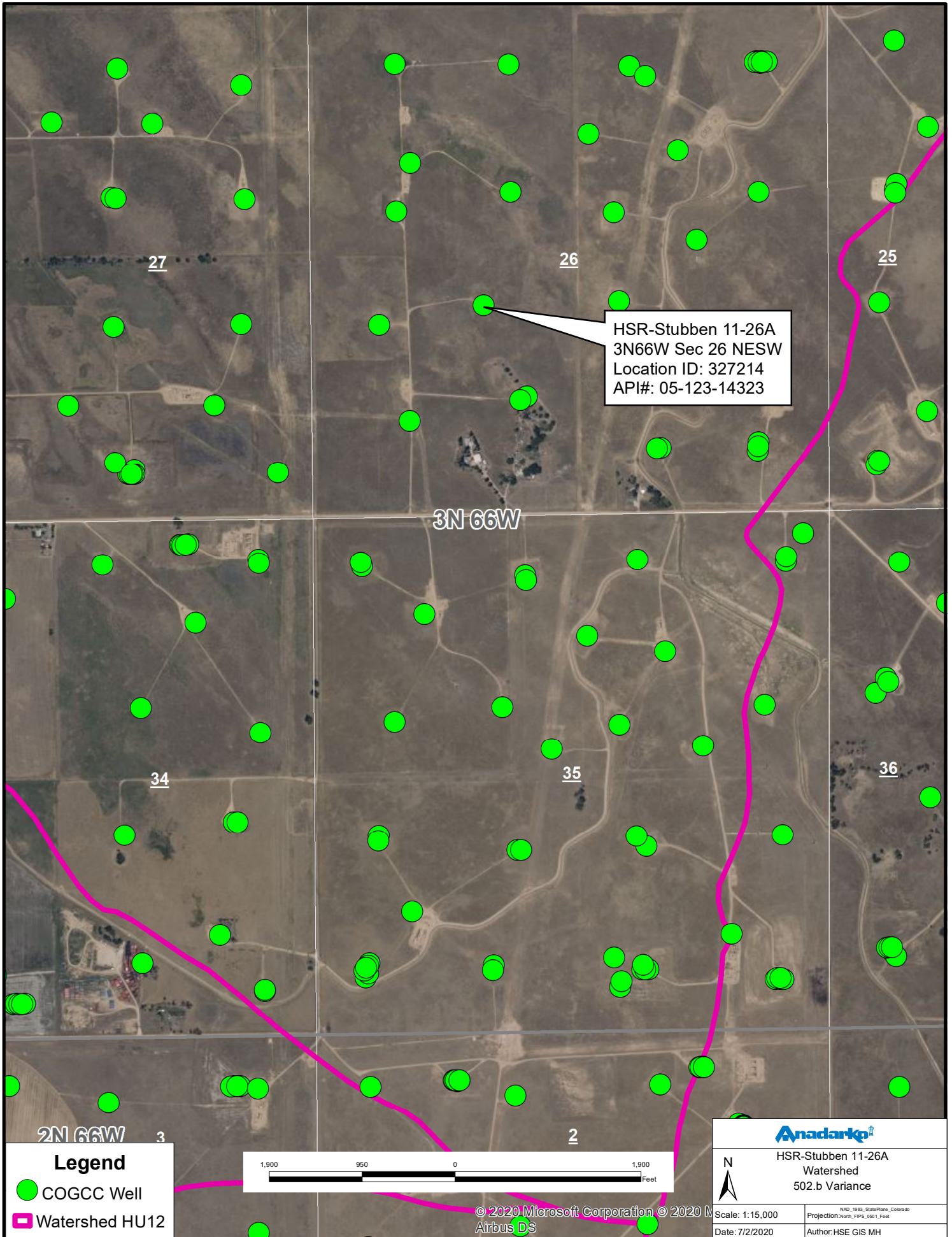


Anadarko[®]

HSR-Stubben 11-26A
Reclamation and Ownership
502.b Variance
Exhibit A-1.a

<small>Scale: 1:7,000</small>	<small>Projection: NAD_1983_StatePlane_Colorado</small>
<small>Date: 4/17/2020</small>	<small>Author: HSE GIS MH</small>

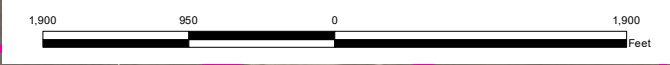
For internal information only. Depicted information is subjective and its accuracy has not been verified. Printed or saved versions may be outdated. Depictions and information are intended to be confidential, and may be subject to legal restrictions or protections. For questions regarding appropriate use, contact the GSC (x62900).



HSR-Stubben 11-26A
 3N66W Sec 26 NESW
 Location ID: 327214
 API#: 05-123-14323

Legend

- COGCC Well
- Watershed HU12



Anadarko[®]

HSR-Stubben 11-26A
 Watershed
 502.b Variance

N

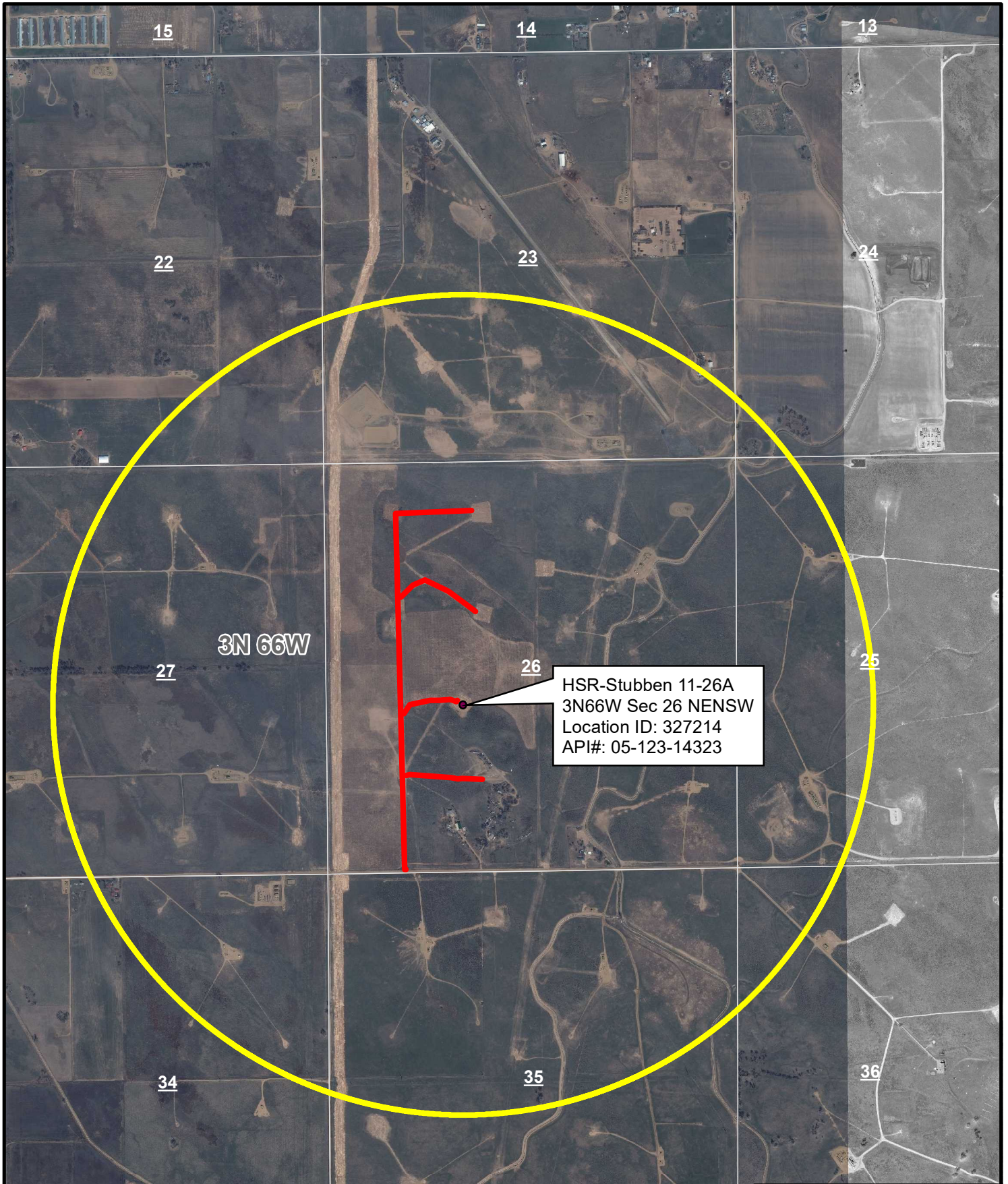
Scale: 1:15,000

Date: 7/2/2020

NAD 1983 StatePlane Colorado
 Projection: NAD_1983_StatePlane_Colorado
 Author: HSE GIS MH

© 2020 Microsoft Corporation © 2020 Airbus DS

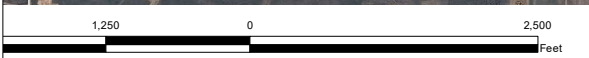
For internal information only. Depicted information is subjective and its accuracy has not been verified. Printed or saved versions may be outdated. Depictions and information are intended to be confidential, and may be subject to legal restrictions or protections. For questions regarding appropriate use, contact the GSC (x62900).



HSR-Stubben 11-26A
 3N66W Sec 26 NENSW
 Location ID: 327214
 API#: 05-123-14323

Legend

- HSR Stubben11-26A Well
- Waived Area
- HSR Stubben11-26A 1Mile Buffer

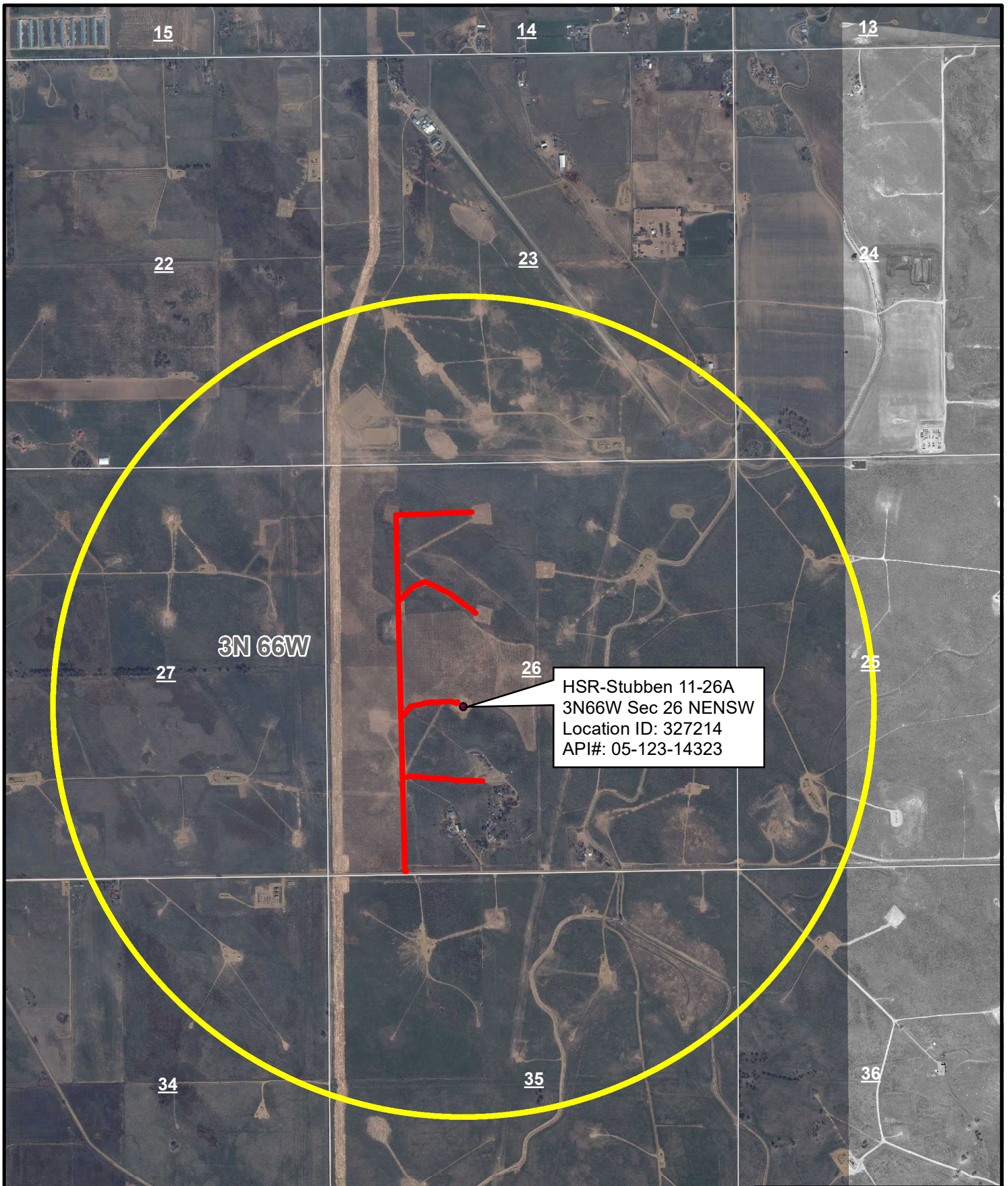


Anadarko

HSR-Stubben 11-26A
 Restricted Occupancy Wildlife
 1 Mile Buffer 502.b Variance
 Exhibit A-1.b

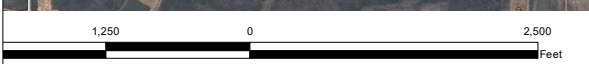
Scale: 1:20,000
 Date: 4/21/2020
 Projection: NAD_1983_StatePlane_Colorado
 Author: HSE GIS MH

For internal information only. Depicted information is subjective and its accuracy has not been verified. Printed or saved versions may be outdated. Depictions and information are intended to be confidential, and may be subject to legal restrictions or protections. For questions regarding appropriate use, contact the GSC (x62900).



Legend

- HSR Stubben11-26A Well
- Waived Area
- HSR Stubben11-26A 1Mile Buffer



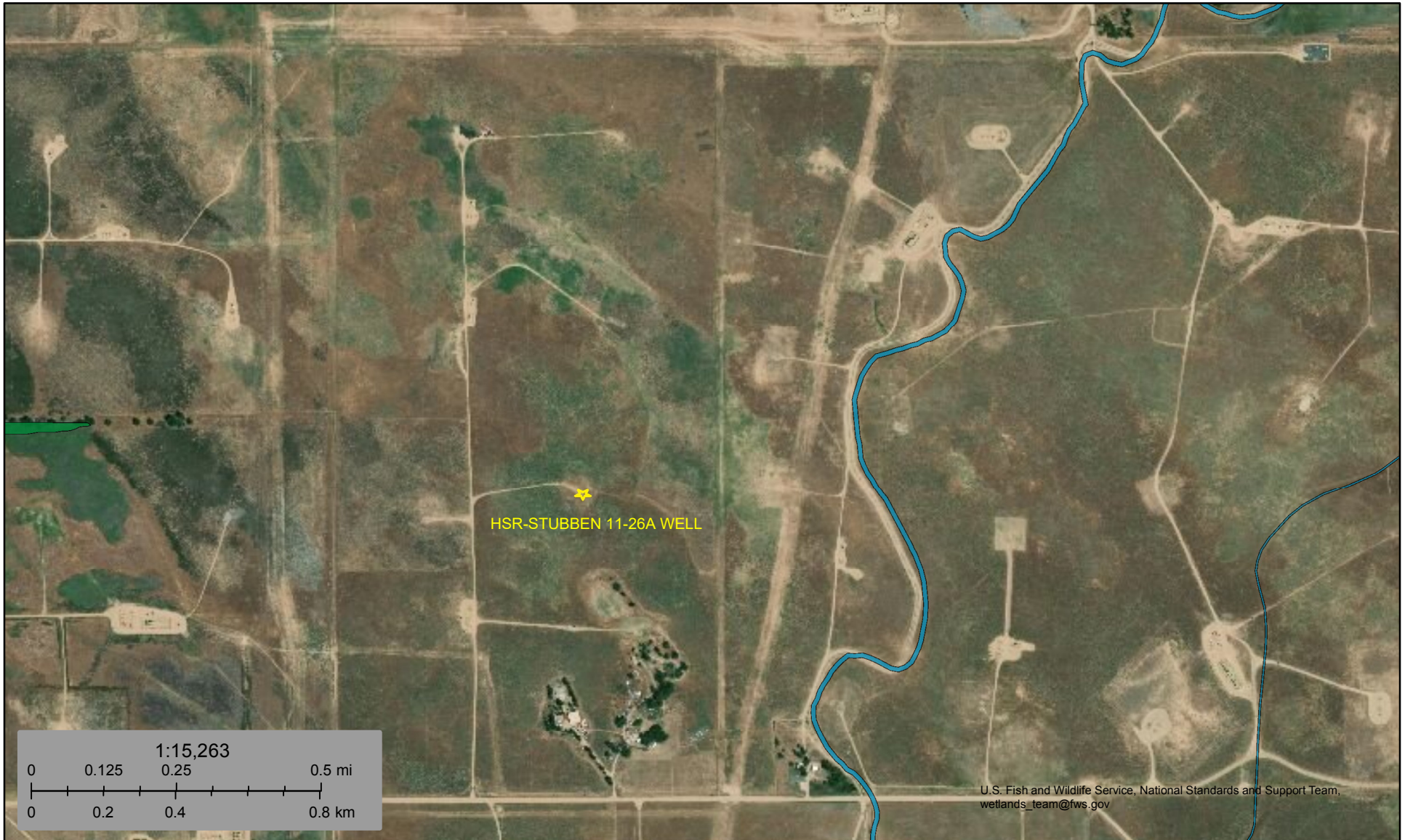
Anadarko

HSR-Stubben 11-26A
Sensitive Wildlife Area
1 Mile Buffer 502.b Variance
Exhibit A-1.c

Scale: 1:20,000
Date: 4/21/2020








Projection: NAD_1983_StatePlane_Colorado
Author: HSE GIS MH

For internal information only. Depicted information is subjective and its accuracy has not been verified. Printed or saved versions may be outdated. Depictions and information are intended to be confidential, and may be subject to legal restrictions or protections. For questions regarding appropriate use, contact the GSC (x62900).



April 20, 2020

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Appendix A – Reclamation Waiver and Release

Kerr-McGee Oil & Gas Onshore LP

November 21, 2019

Bradley Beierle
PO BOX 387
PLATTEVILLE, CO 80651-0387

Re: WAIVER OF FINAL RECLAMATION OF ACCESS ROAD TO THE FOLLOWING WELL:
HSR-Stubben 11-26A
Township 3 North, Range 66 West, 6th P.M.
Section 26: NESW
Weld County, Colorado (the "Property")

Dear Bradley Beierle,

Kerr-McGee Oil & Gas Onshore LP ("KMOG") initially consulted with you, the surface owner ("Surface Owner") of the Property, on November 21, 2019 concerning the Final Reclamation of the Property following the plugging and abandonment of the above referenced HSR-Stubben 11-26A well location ("Location").

Pursuant to Colorado Oil and Gas Conservation Commission ("COGCC" or "Commission") Rule 1004, KMOG is required to conduct Final Reclamation activities, including but not limited to restoring access roads to their original grade and contour. The Commission will grant KMOG a variance that waives compliance with Rule 1004, provided KMOG and the Surface Owner enter into a reclamation waiver agreement and KMOG satisfies other Final Reclamation requirements with the Commission.

During our consultation concerning Final Reclamation of the Property, Bradley Beierle, requested that KMOG not reclaim certain features at the Location back to its original grade and contour as nearly as practicable. This waiver ("Waiver"), Exhibit A and Exhibit A-1 attached hereto and incorporated herein, set forth the agreement between Surface Owner and KMOG regarding the waiver of Final Reclamation requirements for the Property.

Exhibit A depicts the specific reclamation plan for the Property, including but not limited to, identifying that specific portion of the access road for which you waive Final Reclamation requirements under COGCC Rule 1004. Exhibit A also includes a description of the reclamation plans on those areas that are not subject to this Waiver. KMOG will conduct its Final Reclamation of all other areas on the Property in accordance with the attached plan. Exhibit A-1 identifies the Location in more detail, the portions of the Location that Surface Owner is waiving Final Reclamation.

The reason you are waiving KMOG's obligation to perform Final Reclamation is:

- 1) Surface Owner intends to use the existing 710' long and 10' wide two-track access road for continued stabilized access to the surface property due to sandy soil conditions and to reduce potential erosion and rutting from landowner's vehicles.

By waiving KMOG's Final Reclamation obligations required under COGCC Rule 1004 as set forth in this Waiver, you are acknowledging that the portions of the access road subject to this Waiver are acceptable to you in their current grade and contour. By executing below and agreeing to the reclamation plan set forth in this Waiver, Exhibit A and Exhibit A-1 for the Location, you acknowledge that you are knowingly and

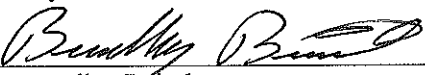
forever waiving all reclamation protections otherwise afforded by COGCC Rule 1004 for the identified Location, and are responsible for future reclamation, maintenance, upkeep, and topsoil protection. Additionally by executing below, you acknowledge that the portions of the Location not included in this variance request remain under COGCC jurisdiction until passing Final Reclamation inspection. By executing this Waiver, Surface Owner understands that the COGCC could deny this variance request, and instead require KMOG to reclaim the entire Location, including the CHANGE THIS ASAP, back to their original state as nearly as practicable.

This Waiver contains all of the agreements, conditions, promises and covenants between the parties with respect to the subject matter hereof and supersedes all prior or contemporaneous agreements, representations or understandings with respect to the subject matter hereof. This Waiver shall be binding upon and inure to the benefit of the parties and their respective agents, officers, employees, shareholders, directors, insurers, legal representatives, heirs, successors and assigns. This Waiver shall be construed and governed in accordance with the laws of the State of Colorado without regard to the choice of law provisions thereof. This Waiver may be executed via facsimile or email by PDF format in one or more counterparts, all of which when taken together shall constitute one agreement.

If you are in agreement with the terms and conditions of this Waiver, please sign and date below.

ACCEPTED AND AGREED:

Bradley Beierle



By: Bradley Beierle
Title: Landowner

Date: JAN 14, 2020

**WAIVER OF FINAL RECLAMATION
(EXHIBIT A)**

COGCC FACILITY/LOCATION STATUS: PA		LOCATION ID: 327214	
API/Facility ID	Well Name	Location	COGCC Rule Variance
05-123-14323	HSR-Stubben 11-26A	3N: 66W 26: NESW	1004.a

This Exhibit A sets forth the following: i) the specific Final Reclamation plan for your property; ii) those specific portions of the access road for which you have waived Kerr-McGee Oil & Gas Onshore LP's ("KMOG") reclamation requirements under Colorado Oil & Gas Conservation Commission ("COGCC") Rule 1004, more specifically shown on the Exhibit "A-1"

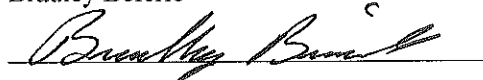
Based on our initial consultation with you on November 21, 2019, KMOG will conduct Final Reclamation on your property in accordance with the following:

1. The 710' long and 10' wide two-track access road will remain in place running easterly from the North/South main access road for permanent use by surface owner for stabilized access to the surface property due to sandy soil conditions and to reduce potential erosion and rutting from landowner's vehicles".
2. The well site has had road base removed, topsoil imported, compaction alleviated, seeded and stabilized with straw mulch

With the exception of the aforementioned items, KMOG has performed all Final Reclamation of all other areas of the location that you have not waived COGCC Rule 1004. KMOG has performed all Final Reclamation requirements as specified in COGCC Rule 1004, which cannot be waived by the Surface Owner.

The HSR-Stubben 11-26A well has been plugged and abandoned in accordance with COGCC Rule 319. Flowline risers have been abandoned per COGCC Rule 1103. All KMOG trash and debris have been removed from location. KMOG has performed routine noxious weed control on location per COGCC Rule 1004. Storm water Management has been conducted on location and in accordance with COGCC Rule 1002.f.

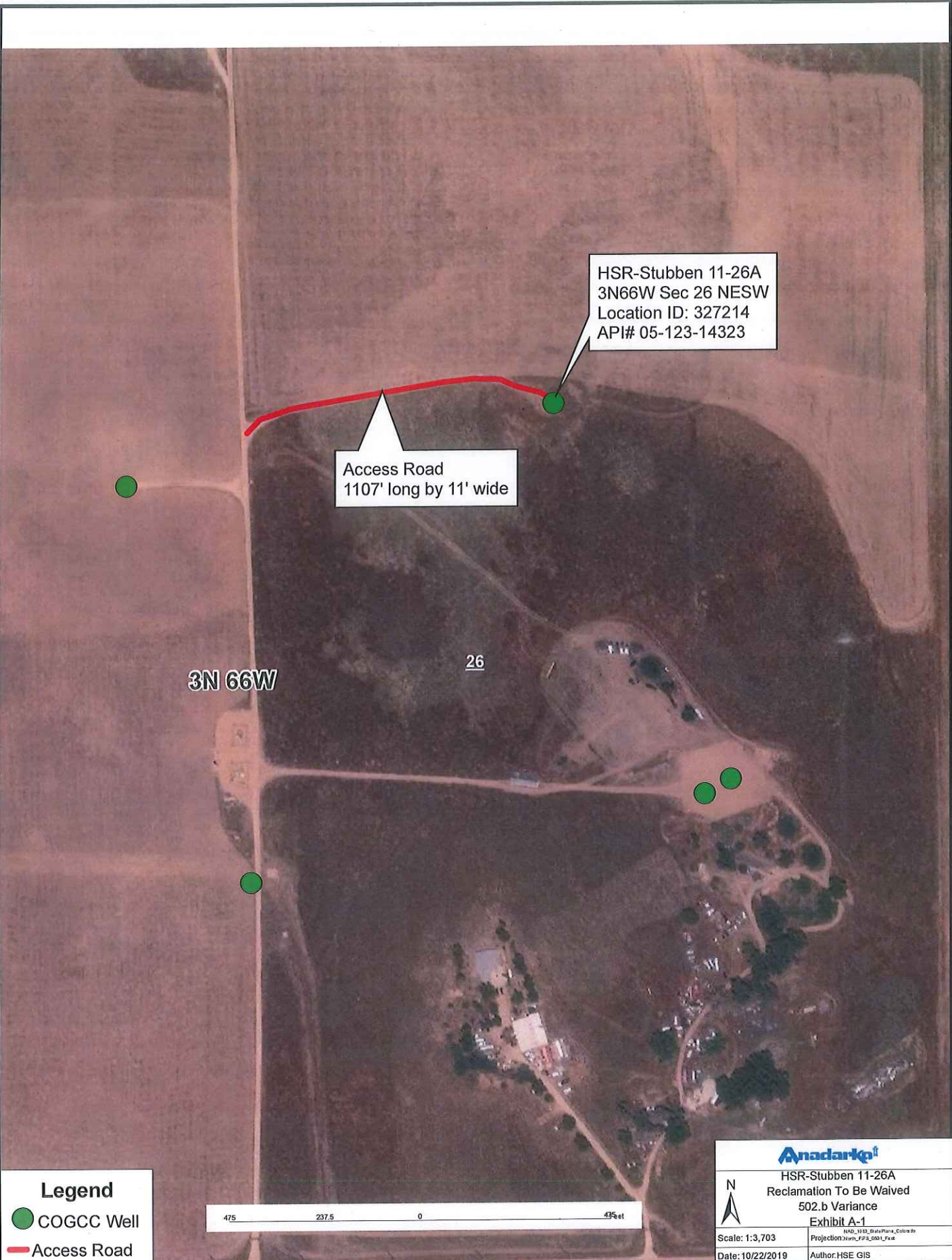
Bradley Beierle



Date: JAN 14, 2020

By: Bradley Beierle

Title: Landowner



HSR-Stubben 11-26A
 3N66W Sec 26 NESW
 Location ID: 327214
 API# 05-123-14323

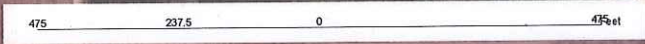
Access Road
 1107' long by 11' wide

3N 66W

26

Legend

- COGCC Well
- Access Road



HSR-Stubben 11-26A Reclamation To Be Waived 502.b Variance Exhibit A-1	
Scale: 1:3,703	Projection: NAD_83_CS_5001_Feet
Date: 10/22/2019	Author: HSE GIS



Appendix B – COGCC Forms (Submitted): Well Abandonment Report
Form 6 and Form 27

Document Number:
402289541

Date Received:
01/20/2020

WELL ABANDONMENT REPORT

This form is to be submitted as an Intent to Abandon whenever an abandonment is planned on a borehole. After the abandonment is complete, this form shall again be submitted as a Subsequent Report of the actual work completed. The approved intent shall be valid for six months after the approval date, after that period, a new intent will be required. Attachments required with the Intent to Abandon are wellbore diagrams of the current configuration and the proposed configuration with plugs set. A Subsequent Report of Abandonment shall indicate the actual work completed. Attachments required with a Subsequent Report are a wellbore diagram showing plugs that were set and casing remaining in the hole, the job summaries from all plugging contractors used, including wireline and cementing (third party verification) and any logs that may have been run during abandonment.

OGCC Operator Number: 47120 Contact Name: Doreen Green
 Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP Phone: (970) 336-3555
 Address: P O BOX 173779 Fax: _____
 City: DENVER State: CO Zip: 80217- Email: rscdjpostdrill@anadarko.com

For "Intent" 24 hour notice required, Name: _____ Tel: _____
 Email: _____

COGCC contact: _____

Type of Well Abandonment Report: Notice of Intent to Abandon Subsequent Report of Abandonment

API Number 05-123-14323-00
 Well Name: HSR-STUBBEN Well Number: 11-26A
 Location: QtrQtr: NESW Section: 26 Township: 3N Range: 66W Meridian: 6
 County: WELD Federal, Indian or State Lease Number: _____
 Field Name: WATTENBERG Field Number: 90750

Only Complete the Following Background Information for Intent to Abandon

Latitude: 40.194837 Longitude: -104.747584
 GPS Data: GPS Quality Value: 1.5 Type of GPS Quality Value: PDOP Date of Measurement: 01/02/2020
 GPS Instrument Operator's Name: PAT MCCLURE
 Reason for Abandonment: Dry Production Sub-economic Mechanical Problems
 Other _____
 Casing to be pulled: Yes No Estimated Depth: _____
 Fish in Hole: Yes No If yes, explain details below
 Wellbore has Uncemented Casing leaks: Yes No If yes, explain details below
 Details: _____

Current and Previously Abandoned Zones

Formation	Perf. Top	Perf. Btm	Abandoned Date	Method of Isolation	Plug Depth
CODELL	7428	7442	11/01/2019	B PLUG CEMENT TOP	7100
NIOBRARA	7154	7290	11/01/2019	B PLUG CEMENT TOP	7100
J SAND	7879	7939	11/01/2019	B PLUG CEMENT TOP	7800

Total: 3 zone(s)

Casing History

Casing Type	Size of Hole	Size of Casing	Weight Per Foot	Setting Depth	Sacks Cement	Cement Bot	Cement Top	Status
SURF	12+1/4	8+5/8	24	659	340	659	0	VISU
1ST	7+7/8	4+1/2	11.6	7,560	170	7,560	6,645	CBL
S.C. 1.1				6,630	100	6,630	6,248	CBL
S.C. 1.2				5,830	100	5,830	5,500	CBL
1ST LINER	3+7/8	2+7/8	6.5	8,029	35	8,029	7,520	CBL

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 7800 with 2 sacks cmt on top. CIPB #2: Depth 7100 with 25 sacks cmt on top.
 CIBP #3: Depth _____ with _____ sacks cmt on top. CIPB #4: Depth _____ with _____ sacks cmt on top.
 CIBP #5: Depth _____ with _____ sacks cmt on top.

NOTE: Two(2) sacks cement required on all CIBPs.

Set 25 sks cmt from 7100 ft. to 6663 ft. Plug Type: CASING Plug Tagged:
 Set 10 sks cmt from 4284 ft. to 4098 ft. Plug Type: CASING Plug Tagged:
 Set 200 sks cmt from 1445 ft. to 735 ft. Plug Type: STUB PLUG Plug Tagged:
 Set 50 sks cmt from 152 ft. to 0 ft. Plug Type: CASING Plug Tagged:
 Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:

Perforate and squeeze at 4628 ft. with 75 sacks. Leave at least 100 ft. in casing 4284 CICR Depth
 Perforate and squeeze at _____ ft. with _____ sacks. Leave at least 100 ft. in casing _____ CICR Depth
 Perforate and squeeze at _____ ft. with _____ sacks. Leave at least 100 ft. in casing _____ CICR Depth

(Cast Iron Cement Retainer Depth)

Set 103 sacks half in. half out surface casing from 735 ft. to 416 ft. Plug Tagged:
 Set _____ sacks at surface

Cut four feet below ground level, weld on plate Above Ground Dry-Hole Marker: Yes No

Set _____ sacks in rat hole Set _____ sacks in mouse hole

Additional Plugging Information for Subsequent Report Only

Casing Recovered: 1335 ft. 4+1/2 inch casing Cut and Cap Date: 01/02/2020
 of _____

*Wireline Contractor: CUTTERS *Cementing Contractor: NEXTIER

Type of Cement and Additives Used: _____

Flowline/Pipeline has been abandoned per Rule 1105 Yes No

Technical Detail/Comments:

ADDITIONAL PERFS @ 4228

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____ Print Name: Doreen Green

Title: Analyst Date: 1/20/2020 Email: rscdjpostdrill@anadarko.com

Based on the information provided herein, this Well Abandonment Report (Form 6) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: Jacobson, Eric Date: 4/14/2020

CONDITIONS OF APPROVAL, IF ANY: _____

<u>COA Type</u>	<u>Description</u>

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402289541	FORM 6 SUBSEQUENT SUBMITTED
402289576	CEMENT JOB SUMMARY
402289577	OTHER
402289579	OTHER
402289580	GYRO SURVEY
402289581	WELLBORE DIAGRAM
402289582	OPERATIONS SUMMARY
402289583	WIRELINE JOB SUMMARY

Total Attach: 8 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402234805

Receive Date:

11/08/2019

Report taken by:

PETER GINTAUTAS

Site Investigation and Remediation Workplan (Initial Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by COGCC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATION

Name of Operator: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Gregory Hamilton</u>	Email: <u>Gregory_Hamilton@oxy.com</u>	Mobile: <u>(970) 515-1698</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 14550 Initial Form 27 Document #: 402234805

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water |
| <input checked="" type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste | <input type="checkbox"/> Rule 906.c.: Director request |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____ |

SITE INFORMATION

N Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>327214</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-STUBBEN-63N66W 26NESW</u>	Latitude: <u>40.194850</u>	Longitude: <u>-104.747540</u>	
	** correct Lat/Long if needed: Latitude: <u>40.192657</u>	Longitude: <u>-104.750362</u>	
QtrQtr: <u>NESW</u>	Sec: <u>26</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Non-crop land

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Multiple buildings are located within 1/4 mile of the facility.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- E&P Waste** **Other E&P Waste** **Non-E&P Waste**
- Produced Water Workover Fluids
- Oil Tank Bottoms
- Condensate Pigging Waste
- Drilling Fluids Rig Wash
- Drill Cuttings Spent Filters
- Pit Bottoms
- Other (as described by EPA)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	TBD	Soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

This form has been prepared to provide prior notice of the closure of a partially-buried produced water vessel (vessel) at the HSR-Stubben 11-26A facility. In accordance with COGCC Rule 905.b., soil samples and a groundwater sample (if present) will be collected following removal of the vessel to determine if soil and groundwater (if present) meet the concentration levels of COGCC Table 910-1. Field screening of soils will be conducted during vessel removal activities.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Following the removal of the vessel, discrete grab soil samples will be collected from the sidewalls and base of the excavation. The soil samples will be field screened for total volatile organic compounds using a photoionization detector (PID). The base soil sample will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalene, and total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260C, TPH - diesel range organics (DRO) and oil range organics (ORO) by USEPA Method 8015C, pH by USEPA Method 9045D, specific conductance (EC) by USEPA Method 9050A, and sodium adsorption ratio (SAR) by USDA Agricultural Handbook 60 Method 20B. The sidewall soil samples will be submitted for laboratory analysis of BTEX, naphthalene, and TPH.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

If groundwater is encountered during vessel removal activities, a minimum of one grab sample will be collected as soon as practical following removal of the vessel and submitted for laboratory analysis of BTEX by USEPA Method 8260.

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 910-1 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

NA / ND

_____ Highest concentration of TPH (mg/kg) _____
_____ Highest concentration of SAR _____
_____ BTEX > 910-1 _____
_____ Vertical Extent > 910-1 (in feet) _____

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed _____
Number of groundwater samples exceeding 910-1 _____

_____ Highest concentration of Benzene (µg/l) _____
_____ Highest concentration of Toluene (µg/l) _____
_____ Highest concentration of Ethylbenzene (µg/l) _____
_____ Highest concentration of Xylene (µg/l) _____
_____ Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
_____ Number of surface water samples exceeding 910-1
If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If a suspected release is identified and confirmed through soil screening and/or laboratory analysis, soils will be removed and transported to a licensed disposal facility. Disposal records will be kept on file and available upon request.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Potential impacts that meet the criteria in Rule 906.b. will be reported to the Director in accordance with that Rule and a site-specific soil and/or groundwater remediation plan will be developed and submitted to the COGCC via a supplemental Form 27 in accordance with Rule 906.c. If reportable impacts are not encountered, a supplemental Form 27 requesting closure will be submitted within 90 days of removal of the vessel. Field screening and applicable laboratory analytical results will be reported in all submittals. E&P waste records of material transported off-site are kept on file and available upon request.

Soil Remediation Summary

In Situ

- Bioremediation (or enhanced bioremediation)
- Chemical oxidation
- Air sparge / Soil vapor extraction
- Natural Attenuation
- Other _____

Ex Situ

- Excavate and offsite disposal
- If Yes: Estimated Volume (Cubic Yards) _____
- Name of Licensed Disposal Facility or COGCC Facility ID # _____
- Excavate and onsite remediation
- Land Treatment
- Bioremediation (or enhanced bioremediation)
- Chemical oxidation
- Other _____

Groundwater Remediation Summary

- Bioremediation (or enhanced bioremediation)
- Chemical oxidation
- Air sparge / Soil vapor extraction
- Natural Attenuation
- Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other _____

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim? Final?

Did the Surface Owner approve the seed mix? _____

If NO, does the seed mix comply with local soil conservation district recommendations? _____

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/11/2019

Date of commencement of Site Investigation. 11/11/2019

Date of completion of Site Investigation. 11/11/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

--

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Gregory Hamilton

Title: Senior Staff Env Rep

Submit Date: 11/08/2019

Email: Gregory_Hamilton@oxy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: PETER GINTAUTAS

Date: 11/08/2019

Remediation Project Number: 14550

COA Type**Description**

	Submit supplemental form 27 to provide details of site investigation including site map, analytical summary and analytical reports within 45 days following removal of produced water vessel.
--	---

Attachment Check List

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num**Name**

402234805	FORM 27-INITIAL-SUBMITTED
402234810	SITE MAP

Total Attach: 2 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
402295502
Receive Date:
02/24/2020

Report taken by:
PETER GINTAUTAS

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by COGCC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation. Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATION

Name of Operator: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers Phone: <u>(970) 336-3500</u> Mobile: <u>(970) 515-1698</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		
Contact Person: <u>Gregory Hamilton</u> Email: <u>Gregory_Hamilton@oxy.com</u>		

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 14550 Initial Form 27 Document #: _____

PURPOSE INFORMATION

<input type="checkbox"/> 901.e. Sensitive Area Determination	<input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
<input checked="" type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure	<input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
<input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation	<input checked="" type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project
<input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste	<input type="checkbox"/> Rule 906.c.: Director request
<input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure	<input type="checkbox"/> Other _____

SITE INFORMATION N Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>327214</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-STUBBEN-63N66W 26NESW</u>	Latitude: <u>40.194850</u>	Longitude: <u>-104.747540</u>	
	** correct Lat/Long if needed: Latitude: <u>40.192657</u>	Longitude: <u>-104.750362</u>	
QtrQtr: <u>NESW</u>	Sec: <u>26</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Non-crop land

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Multiple buildings are located within 1/4 mile of the facility.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	SOILS	No impacts encountered	Soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

A partially-buried produced water vessel (PWV) was removed from the HSR-Stubben 11-26A facility on January 17, 2020. Groundwater and impacted soil were not encountered in the PWV excavation. A liner was not present beneath the PWV at this site. The PWV at this facility has been permanently removed. Soil samples from the excavation were submitted for laboratory analysis to determine if a release occurred. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample locations are illustrated on Figure 2.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

On January 17, 2020, five (5) confirmation soil samples were collected from the sidewalls and base of the final extent of the excavation area at depths of approximately 4 feet and 5 feet below ground surface (bgs), respectively. The base soil sample was submitted for laboratory analysis of BTEX, naphthalene, and total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260D, TPH - diesel range organics (DRO) and oil range organics (ORO) by USEPA Method 8015D, pH by USEPA Method 9045D, specific conductance (EC) by USEPA Method 9050A, and sodium adsorption ratio (SAR) by USDA Agricultural Handbook 60 Method 20B. The sidewall soil samples were submitted for laboratory analysis of BTEX, naphthalene, and TPH. Laboratory analytical results indicated that constituent concentrations in the soil samples collected from the final extent of the excavation area were in full compliance with COGCC standards.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

No groundwater was encountered in the excavation.

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample locations are illustrated on Figure 2. Soil analytical results are summarized in Table 1. The laboratory analytical report is provided as Attachment A. A partially-buried vessel was removed during facility abandonment activities.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 910-1 0
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 0.35
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed _____
Number of groundwater samples exceeding 910-1 _____

Highest concentration of Benzene (µg/l) _____
Highest concentration of Toluene (µg/l) _____
Highest concentration of Ethylbenzene (µg/l) _____
Highest concentration of Xylene (µg/l) _____
Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
Number of surface water samples exceeding 910-1 _____
If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Laboratory results indicate that constituent concentrations in the soil samples collected from the final extent of the excavation area were in full compliance with COGCC Table 910-1 allowable levels; therefore, no soils were removed. The excavation area was backfilled and contoured to match pre-existing site conditions.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Laboratory results indicate that constituent concentrations in the 5 soil samples collected from the final extent of the excavation area were in full compliance with COGCC standards. Groundwater was not encountered in the excavation. Based on the analytical data presented herein, assessment is complete at this site and no further activities are required. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ Land Treatment
- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Other _____

Groundwater Remediation Summary

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Final Report _____

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report

Other Produced Water Vessel Closure _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes _____

Do all soils meet Table 910-1 standards? Yes _____

Does the previous reply indicate consideration of background concentrations? No _____

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? _____

Does Groundwater meet Table 910-1 standards? No _____

Is additional groundwater monitoring to be conducted? No _____

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim? Final?

Did the Surface Owner approve the seed mix? _____

If NO, does the seed mix comply with local soil conservation district recommendations? _____

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/17/2020

Date of commencement of Site Investigation. 01/17/2020

Date of completion of Site Investigation. 01/17/2020

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Based on the analytical data provided herein, Kerr-McGee is requesting an NFA determination for this location.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Gregory Hamilton

Title: Senior Staff Env Rep

Submit Date: 02/24/2020

Email: Gregory_Hamilton@oxy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: PETER GINTAUTAS

Date: 02/24/2020

Remediation Project Number: 14550

COA Type**Description**

	Based on the information presented, it is concluded that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or further remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
--	--

Attachment Check List

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num**Name**

402295502	FORM 27-SUPPLEMENTAL-SUBMITTED
402301131	SITE MAP
402301135	SOIL SAMPLE LOCATION MAP
402301140	ANALYTICAL RESULTS
402320559	ANALYTICAL RESULTS

Total Attach: 5 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)

**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
Document Number: 402484953			
Date Received: 09/09/2020			

SUNDRY NOTICE

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number; identify Oil and Gas Location by Location ID Number; identify other Facility by Facility ID Number.

OGCC Operator Number: 47120 Contact Name Kate Graves
 Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP Phone: (970) 5151627
 Address: 501 N DIVISION BLVD Fax: ()
 City: PLATTEVILLE State: CO Zip: 80651 Email: kate_graves@oxy.com

Complete the Attachment Checklist

OP OGCC

API Number : 05- 123 00 OGCC Facility ID Number: 327414
 Well/Facility Name: HSR-RUSSELL-63N66W Well/Facility Number: 26NENW
 Location QtrQtr: NENW Section: 26 Township: 3N Range: 66W Meridian: 6
 County: WELD Field Name: WATTENBERG
 Federal, Indian or State Lease Number: _____

Survey Plat		
Directional Survey		
Srvc Eqpmt Diagram		
Technical Info Page		
Other		

CHANGE OF LOCATION OR AS BUILT GPS REPORT

- Change of Location * As-Built GPS Location Report As-Built GPS Location Report with Survey

* Well location change requires new plat. A substantive surface location change may require new Form 2A.

SURFACE LOCATION GPS DATA Data must be provided for Change of Surface Location and As Built Reports.

Latitude _____ GPS Quality Value: _____ Type of GPS Quality Value: _____ Measurement Date: _____
 Longitude _____ GPS Instrument Operator's Name _____

LOCATION CHANGE (all measurements in Feet)

Well will be: _____ (Vertical, Directional, Horizontal)

Change of **Surface** Footage **From** Exterior Section Lines:

Change of **Surface** Footage **To** Exterior Section Lines:

Current **Surface** Location **From** QtrQtr NENW Sec 26

New **Surface** Location **To** QtrQtr _____ Sec _____

Change of **Top of Productive Zone** Footage **From** Exterior Section Lines:

Change of **Top of Productive Zone** Footage **To** Exterior Section Lines:

Current **Top of Productive Zone** Location **From** Sec _____

New **Top of Productive Zone** Location **To** Sec _____

Change of **Bottomhole** Footage **From** Exterior Section Lines:

Change of **Bottomhole** Footage **To** Exterior Section Lines:

Current **Bottomhole** Location Sec _____ Twp _____

New **Bottomhole** Location Sec _____ Twp _____

Is location in High Density Area? _____

Distance, in feet, to nearest building _____, public road: _____, above ground utility: _____, railroad: _____,
 property line: _____, lease line: _____, well in same formation: _____

Ground Elevation _____ feet Surface owner consultation date _____

FNL/FSL		FEL/FWL	
<input type="text" value="660"/>	<input type="text" value="FNL"/>	<input type="text" value="1980"/>	<input type="text" value="FWL"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Twp <input type="text" value="3N"/>	Range <input type="text" value="66W"/>	Meridian <input type="text" value="6"/>	
Twp <input type="text"/>	Range <input type="text"/>	Meridian <input type="text"/>	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="**"/>
Twp <input type="text"/>	Range <input type="text"/>		
Twp <input type="text"/>	Range <input type="text"/>		
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="**"/>
Range <input type="text"/>			
Range <input type="text"/>			

** attach deviated drilling plan

OTHER CHANGES

REMOVE FROM SURFACE BOND Signed surface use agreement is a required attachment

CHANGE OF WELL, FACILITY OR OIL & GAS LOCATION NAME OR NUMBER

From: Name HSR-RUSSELL-63N66W Number 26NENW Effective Date: _____

To: Name _____ Number _____

ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.

WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number _____ has not been drilled.

PIT: Abandon Earthen Pit Permit (Form 15) – COGCC Pit Facility ID Number _____ has not been constructed (Permitted and constructed pit requires closure per Rule 905)

CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number _____ has not been constructed (Constructed facility requires closure per Rule 908)

OIL & GAS LOCATION ID Number: _____

Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.

REQUEST FOR CONFIDENTIAL STATUS

DIGITAL WELL LOG UPLOAD

DOCUMENTS SUBMITTED Purpose of Submission: _____

RECLAMATION

INTERIM RECLAMATION

Interim Reclamation will commence approximately _____

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

Field inspection will be conducted to document Rule 1003.e. compliance

FINAL RECLAMATION

Final Reclamation will commence approximately _____

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

Field inspection will be conducted to document Rule 1004.c. compliance

Comments:

ENGINEERING AND ENVIRONMENTAL WORK

NOTICE OF CONTINUED TEMPORARILY ABANDONED STATUS

Indicate why the well is temporarily abandoned and describe future plans for utilization in the COMMENTS box below or provide as an attachment, as required by Rule 319.b.(3).

Date well temporarily abandoned _____ Has Production Equipment been removed from site? _____

Mechanical Integrity Test (MIT) required if shut in longer than 2 years. Date of last MIT _____

SPUD DATE: _____

TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

NOTICE OF INTENT Approximate Start Date _____

REPORT OF WORK DONE Date Work Completed 08/19/2020

<input type="checkbox"/> Intent to Recomplete (Form 2 also required)	<input type="checkbox"/> Request to Vent or Flare	<input type="checkbox"/> E&P Waste Mangement Plan
<input type="checkbox"/> Change Drilling Plan	<input type="checkbox"/> Repair Well	<input type="checkbox"/> Beneficial Reuse of E&P Waste
<input type="checkbox"/> Gross Interval Change	<input checked="" type="checkbox"/> Rule 502 variance requested. Must provide detailed info regarding request.	
<input type="checkbox"/> Other _____	<input type="checkbox"/> Status Update/Change of Remediation Plans for Spills and Releases	

COMMENTS:

Waive reclamation of access road, cattleguard, and gates, surface owner agreements and exhibits attached. Please route to Chris Binschus.

H2S REPORTING

Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.

Gas Analysis Report must be attached.

H2S Concentration: _____ in ppm (parts per million) Date of Measurement or Sample Collection _____

Description of Sample Point:

Empty text box for description of sample point.

Absolute Open Flow Potential _____ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Empty text box for description of release potential and duration.

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: _____

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: _____

COMMENTS:

[Empty comment box]

Best Management Practices

No BMP/COA Type

Description

--	--

Operator Comments:

Please route to Chris Binschus.

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____ Print Name: Kate Graves
 Title: Advisor HSE Ops Email: kate_graves@oxy.com Date: 9/9/2020

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: _____ Date: _____

CONDITIONS OF APPROVAL, IF ANY:

COA Type

Description

--	--

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)

Attachment Check List

Att Doc Num

Name

402484953	FORM 4 SUBMITTED
402484960	VARIANCE REQUEST

Total Attach: 2 Files

Appendix C - Photolog

Variance Photolog for HSR-Stubben 11-26A

Photo 1 (below)-Access road and reclaimed well site, facing east



Photo 2 (below)-Access road and rangeland that owner is in process of improving, facing west



Photo 3 (below)- Access road branch off of central road, facing southeast



Photo 4 (below)-Access Road facing west



Site Name: HSR-Stubben 11-26A

API Number: 05-123-14323

Location ID: 327214

Date of Photographs: April 21, 2020

Variance Photolog for HSR-Stubben 11-26A

Photo 5-Access road and rangeland that owner is in process of improving, facing north



Photo 6 (below)- Access Road and rangeland, facing south



Site Name: HSR-Stubben 11-26A

API Number: 05-123-14323

Location ID: 327214

Date of Photographs: April 21, 2020

Appendix D: Stormwater Inspection



LOCATION SELECTION

Canvas User Email margaret_hess@oxy.com
Selected Well/Location HSR-STUBBEN 11-26A
Actual Artemis Location HSR-STUBBEN 11-26A
Contractor {Anadarko - Reclamation Team}
Inspector Margaret Hess
Inspection Type Final
Inspection Date 07/07/2020
Road Directions
 CR 28 and 31, E 1 2/10, N 3/10 E 1/10 into
Latitude/Longitude 40.194850/-104.747540
Land Rep
Last Inspection
Well APIs 12314323
Loc General Notes
 Variance on the access road
Variance Comments
 Access road variance being executed

INSPECTION SURVEY

Land Use Pasture
Was TB Inspected?
Is TB Active?
Is Access Road Present?
Has Culverts?
Has Gates/Cattleguard?
Needs Stormwater BMPs?
Is Debris or Trash on Site?
Has Risers?
Is Livestock Grazing Present?
Has Weeds?
Has Subsidence?
Has Fence?
Needs to Be Recontoured?
Has Road Base?
Needs Compaction Relief?
Visual Estimate of Vegetation Cover (excluding noxious
weeds) 0-25%
General Notes

This is a stormwater inspection for the variance of the access road for the HSR-Stubben 11-26A location.

LAST COMPLETED WORK TASK INFO

Last Task Completed On 03/05/2020 00:00:00
Last Task Completed Evaluate and complete final reclamation practices

PHOTOS AND SITE MAPS

<p>Photo Name</p> <hr/> <p>Photo Type</p> <hr/> <p>Photo</p> <hr/>	<p>HSR-Stubben 11-26A Access Road</p> <hr/> <p>Road Base\Compaction</p> <hr/>
--	---



Photo Notes

Access road is compacted with roadbase and vegetated on all sides. No Stormwater issues were observed at this time.

<p>Photo Name</p> <hr/> <p>Photo Type</p> <hr/>	<p>HSR-Stubben 11-26A Access Road</p> <hr/> <p>Entrance</p> <hr/> <p>Road Base\Compaction</p> <hr/>
---	---

Photo



Photo Notes

HSR-Stubben 11-26A branches off of the main access road, HSR-Russell 6-26A. There were no stormwater issues observed at this junction.

Photo Name

HSR-Stubben 11-26A Wellsite

Photo Type

General Photo

Photo

