

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

CHRIS CANFIELD

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

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 #: 16486 Initial Form 27 Document #: 402583392

PURPOSE INFORMATION

- ☐ Rule 913.c.(1): Pit or Cuttings Trench closure.
- ☐ Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- ☐ Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- ☐ Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- ☐ Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- ☐ Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- ☐ Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- ☐ Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- ☒ Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- ☐ Rule 913.g: Changes of Operator.
- ☐ Rule 915.b: Request to leave elevated inorganics in situ.
- ☐ Other: _____

SITE INFORMATION

☐ Yes ☐ Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-27140</u>	County Name: <u>WELD</u>
Facility Name: <u>RADEMACHER 37-25</u>		Latitude: <u>40.193497</u>	Longitude: <u>-104.947231</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSE</u>	Sec: <u>25</u>	Twp: <u>3N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>479837</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Rademacher Wellhead Release</u>		Latitude: <u>40.193504</u>	Longitude: <u>-104.947247</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSE</u>	Sec: <u>25</u>	Twp: <u>3N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Crop Land

Is domestic water well within 1/4 mile? Yes

Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Surface water is located approximately 250 feet southwest of the facility. The nearest domestic water well is located approximately 800 feet southwest of the facility. A livestock holding pen is located approximately 1,210 feet southwest 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
No	SOILS	No hydrocarbon impacts encountered	Inspection/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.

Wellhead cut and cap operations were completed at the Rademacher 37-25 wellhead on April 14, 2021. Groundwater was not encountered in the wellhead cut and cap excavation area. Visual inspection and field screening of soils around the well and the associated pumping equipment was conducted following wellhead cut and cap operations, and a soil sample (WH-B01@7') was submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results indicated that pH impacts to soil were present at the former wellhead location. As such, a Form 19-Initial Supplemental Spill/Release Report (COGCC Document No. 402661137) was submitted on April 16, 2021, and the COGCC issued Spill/Release Point ID 479837. Following cut and cap operations, the flowline associated with this wellhead was partially removed and the remaining flowline was abandoned in place and the status will be changed to out-of-service in accordance with Rule 1101.a. (3).A,B,&C. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample location and field screening data is presented in Table 1. The wellhead soil sample and field screening locations are illustrated on Figure 2. The flowline field screening locations are illustrated on Figure 3.

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 April 14, 2021, a soil sample (WH-B01@7') was collected from the base of the cut and cap excavation area at approximately 7 feet below ground surface (bgs). The soil sample was submitted for laboratory analysis of BTEX, naphthalene, and TPH - GRO (C6-C10) by USEPA Method 8260D, TPH - DRO (C10-C28) and ORO (C28-C40) by USEPA Method 8015D, pH, specific conductance (EC) and sodium adsorption ratio (SAR) by saturated paste method, and boron by hot water soluble soil extract method. Analytical results indicated that constituent concentrations in sample WH-B01@7' were in compliance with COGCC Table 915-1 standards, with exception to the pH value. However, based on discussions with the COGCC, the pH result was deemed acceptable as there is no indication that a hydrocarbon release occurred at the former wellhead location. Soil analytical results are presented in Tables 2 and 3. Soil sample locations are illustrated on Figure 2. The laboratory analytical report is provided as Attachment A.

Proposed Groundwater Sampling

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

Groundwater was not encountered during wellhead cut and cap or partial flowline removal operations.

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):

On April 14 and September 2, 2021, visual inspection and field screening of soils was conducted at four sidewall locations within the wellhead cut and cap excavation area, four locations at the ground surface adjacent to the cut and cap excavation, and one pothole location during partial flowline removal activities. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the COGCC Operator Guidance for Oil & Gas Facility Closure document. Soil sample location and field screening data is presented in Table 1. Soil analytical results are summarized in Tables 2 and 3. The soil sample and field screening locations are illustrated on Figures 2 and 3. The laboratory analytical report is provided as Attachment A. The field notes and a photographic log are provided as Attachment B.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 1

Number of soil samples exceeding 915-1 1

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 2.83

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

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 915-1

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?

Background soil sample WH-BG01@7' was collected from native material adjacent to the wellhead cut and cap excavation. The background soil sample was submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters using standard methods appropriate for detecting the target analytes in Table 915-1. Analytical results for sample WH-BG01@7' are presented in Table 3.

☐ 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 sample WH-B01@7' were in compliance with COGCC Table 915-1 standards, with exception to the pH value. However, based on discussions with the COGCC, the pH result was deemed acceptable as there is no indication that a hydrocarbon release occurred at the former wellhead location. As a result, no soils were removed during wellhead cut and cap operations. The excavation area will be backfilled and contoured to match pre-existing site conditions.

REMEDIAL ACTION 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 soil sample (WH-B01@7') collected from the base of the wellhead cut and cap excavation area were in compliance with COGCC Table 915-1 standards, with exception to the pH value. However, based on discussions with the COGCC, the pH result was deemed acceptable as there is no indication that a hydrocarbon release occurred at the former wellhead location. 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

Approved Reporting Schedule:

☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Final Report

☐ **Request Alternative Reporting Schedule:**

☐ Semi-Annually ☐ Annually ☐ Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type:

☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other NFA Request

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

If YES:

☒ Compliant with Rule 913.h.(1).

☐ Compliant with Rule 913.h.(2).

☐ Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted?

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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 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 provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 04/16/2021

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/14/2021

Proposed site investigation commencement. 04/14/2021

Proposed completion of site investigation. 09/02/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

☐ Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

Laboratory results indicate that constituent concentrations in sample WH-B01 @7' were in compliance with COGCC Table 915-1 standards, with exception to the pH value. However, based on discussions with the COGCC, the pH result was deemed acceptable as there is no indication that a hydrocarbon release occurred at the former wellhead location. As a result, Kerr-McGee is requesting an NFA determination for this location, based on the analytical and soil screening data provided herein.

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

Signed: Gregory Hamilton

Title: Environmental Consultant

Submit Date: 09/03/2021

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: CHRIS CANFIELD

Date: 09/25/2021

Remediation Project Number: 16486

Condition of Approval**COA Type****Description**

	Based on the information presented, it appears 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 groundwater is found to be impacted, then further investigation and/or remediation activities may be required.
	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
2 COAs	

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**

402802380	FORM 27-SUPPLEMENTAL-SUBMITTED
402802394	PHOTO DOCUMENTATION
402802397	SOIL SAMPLE LOCATION MAP
402802399	ANALYTICAL RESULTS
402802401	SOIL SAMPLE LOCATION MAP
402802402	OTHER
402802404	ANALYTICAL RESULTS
402802406	SITE MAP

Total Attach: 8 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)