

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

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Report taken by:

Taylor Robinson

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

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 20486 Initial Form 27 Document #: 402842917

## 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: LOCATION	Facility ID: 329585	API #: _____	County Name: WELD
Facility Name: HOUSTON-63N67W 17SENE	Latitude: 40.227200	Longitude: -104.907490	
** correct Lat/Long if needed: Latitude: 40.227416		Longitude: -104.908372	
QtrQtr: SENE	Sec: 17	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

  

Facility Type: SPILL OR RELEASE	Facility ID: 481301	API #: _____	County Name: WELD
Facility Name: Houston 17-8L Tank Battery Release	Latitude: 40.227439	Longitude: -104.908658	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 17	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Surface water

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? No

### Other Potential Receptors within 1/4 mile

Diamond Reservoir 220 feet (ft) northwest and retention pond 890 ft southeast. Water well 1,100 ft southwest. Occupied buildings 1,120 ft southwest. County Road 1,100 ft east. Agriculture.

## 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	GROUNDWATER	TBD	Groundwater samples/laboratory analytical results
Yes	SOILS	See attached data.	Soil samples/laboratory analytical results

### INITIAL ACTION SUMMARY

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

Decommissioning activities were completed at the Houston 17-7L, 17-8L O SA Facility on December 17, 2021. Visual inspection and field screening of soil at one aboveground storage tank (AST), one produced water vessel (PWV), one emission control device (ECD), one meter house, one flowline pothole, three dumphine locations, and one separator were conducted following removal activities, and soil samples (AST-B02@3', PW-S01@4', FL-B05@3', and SEP-B01@3') were submitted for analysis of reduced list Table 915-1 constituents including benzene, toluene, ethylbenzene, xylenes (BTEX), naphthalene, total petroleum hydrocarbons (TPH)-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO), and/or 1,2,4- and 1,3,5-trimethylbenzenes (TMBs), pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron and/or Table 915-1 metals, as approved in the Form 27 Initial dated September 18, 2021 (Document No. 402842917) to determine if a release occurred. Samples (PW-B01@5', DL-B02@3', and SEP-B02@3') were submitted for analysis of full list Table 915-1 constituents due to the presence of impacts. Laboratory analytical results indicated that TPH, BTEX, TMBs, naphthalene, benzo(a)anthracene, fluorene, 1-methylnaphthalene, and/or 2-methylnaphthalene impacts exceeding the ECMC Table 915-1 allowable levels were present at the PWV, separator, flowline pothole, and dumphine locations. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 402904928) was submitted on December 22, 2021 and the ECMC issued Spill/Release Point ID 481301. The facility soil sample locations are depicted on Figures 1A and 1B. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively.

Sampling activities are ongoing and will be summarized in a subsequent Form 27 Supplemental report.

### 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 ):

Between December 17, 2021 and May 25, 2022, excavation activities were conducted to address remaining soil impacts at the PWV, separator, flowline pothole, and dumphine locations. Confirmation soil samples were collected from the base and sidewalls of the PWV excavation at a depth of 17 feet below ground surface (ft bgs) and 25 ft bgs, respectively, and from the base and sidewalls of the separator excavation at depths of 5 ft bgs and 6 ft bgs, respectively. Laboratory analytical results indicated soil was in full compliance with Table 915-1 standards, or within range of site-specific background levels, at the extents of the excavations. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively. The laboratory reports are attached.

#### Proposed Groundwater Sampling

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

On April 21, 2022, one groundwater sample (GW01) was collected from the facility excavation at 24.5 ft bgs, and submitted for Table 915-1 analyses. Based on the laboratory analytical results, groundwater concentrations were in full compliance with ECMC Table 915-1 allowable levels for organic constituents. A background groundwater sample is needed to determine inorganic compliance. The excavation groundwater sample location is depicted on Figure 1B. The groundwater sample analytical results are summarized in Table 3.

### **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 December 17, 2021, visual inspections and field screening of soils was conducted at two dumphine locations, three sidewall PWV locations, one AST location, and the ECD footprint. Based on the inspection and screening results, hydrocarbon-impacted soils 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 ECMC Operator Guidance for Oil & Gas Facility Closure. The PID readings and soil sample results are summarized in Table 1. The soil sample locations are depicted on Figure 1A. A photographic log is attached.

## **SITE INVESTIGATION REPORT**

### **SAMPLE SUMMARY**

#### **Soil**

Number of soil samples collected 17

Number of soil samples exceeding 915-1 5

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 594

#### **NA / ND**

-- Highest concentration of TPH (mg/kg) 5290

-- Highest concentration of SAR 17.5

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 25

#### **Groundwater**

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 24

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

NA 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?

Six background soil samples (PW-BG01@2.5', PW-BG01@5', PW-BG02@2.5', PW-BG02@5', PW-BG03@2.5', and PW-BG03@5') were collected from the native material outside of the facility excavations for laboratory analysis of pH, EC, SAR, boron, and metals. Laboratory analytical results indicate that EC, SAR, pH, boron, arsenic, barium, and selenium are naturally high in the native soil. The background soil sample laboratory analytical results are summarized in Table 2.

☐ 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?

Sampling activities are ongoing and will be summarized in a subsequent Form 27 Supplemental report. A background groundwater sample is required to determine groundwater compliance.

## 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.

Approximately 100 CY of impacted soil were removed from the site and transported to the Kerr-McGee Land Treatment Facility for recycling.  
Approximately 120 CY of impacted soil were removed from the site and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal.  
Approximately 200 CY of impacted soil were removed from the site and transported to the Front Range Landfill in Erie, Colorado for disposal. Final disposal information will be provided upon completion of excavation activities. Disposal records will be kept on file and available upon request. The excavation areas were backfilled and contoured to match pre-existing 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 analytical results indicated soil was in full compliance with Table 915-1 standards, or within range of site-specific background levels, at the extents of the excavations. Groundwater was encountered in the facility excavation on April 21, 2022, at 24.5 ft bgs. A background groundwater sample is required to determine groundwater compliance. Sampling activities are ongoing and will be summarized in a subsequent Form 27 Supplemental report.

### Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation ( or enhanced bioremediation )	Yes _____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) _____ 420
_____ Air sparge / Soil vapor extraction	_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ 149007
_____ Natural Attenuation	No _____ Excavate and onsite remediation
_____ Other _____	_____ 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

#### ☐ 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

### Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

KMOG has sufficient insurance and bonding to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. KMOG currently has over 40 million in bonds with the Energy and Carbon Management Commission. The cost for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. KMOG makes no representation or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 5000

### WASTE DISPOSAL INFORMATION

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

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

Approximately 200 CY of impacted soil were removed from the site and transported to the Kerr-McGee Land Treatment Facility for recycling.

Volume of E&P Waste (solid) in cubic yards 420

E&P waste (solid) description Impacted soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: Buffalo Ridge Landfill in Keenesburg, CO (120 CY); Front Range Landfill in Erie, CO (200 CY)

Volume of E&P Waste (liquid) in barrels 0

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? No

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

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 ECMC 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 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. 12/21/2021

Actual Spill or Release date, or date of discovery. 12/20/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/17/2021

Proposed site investigation commencement. 12/17/2021

Proposed completion of site investigation. 06/30/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/17/2021

Proposed date of completion of Remediation. 06/30/2024

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**

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 Lead

Submit Date: 01/22/2024

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: Taylor Robinson

Date: 01/31/2024

Remediation Project Number: 20486

**COA Type****Description**

0 COA	

**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**

403568669	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403568760	PHOTO DOCUMENTATION
403569775	ANALYTICAL RESULTS
403571981	SOIL SAMPLE LOCATION MAP
403571984	SOIL SAMPLE LOCATION MAP
403672376	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)