

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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403619245

Receive Date:

12/15/2023

Report taken by:

Kari Brown

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 ECMC 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) 336-3500
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Gregory Hamilton	Email: Gregory_Hamilton@oxy.com	Mobile: (970) 515-1698

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29026 Initial Form 27 Document #: 403374429

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: WELL	Facility ID: _____	API #: 123-19870	County Name: WELD
Facility Name: VOGL 5-8A	Latitude: 40.154307	Longitude: -104.921059	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 8	Twp: 2N	Range: 67W
Meridian: 6	Sensitive Area? Yes		

Facility Type: SPILL OR RELEASE	Facility ID: 484650	API #: _____	County Name: WELD
Facility Name: VOGL 5-8A WH/FL Historical Release	Latitude: 40.154317	Longitude: -104.921070	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 8	Twp: 2N	Range: 67W
Meridian: 6	Sensitive Area? Yes		

Facility Type: SPILL OR RELEASE	Facility ID: 484670	API #:	County Name: WELD
Facility Name: VOGL 5-8A SEP RISER Hist. Release	Latitude: 40.157812	Longitude: -104.914891	
** correct Lat/Long if needed: Latitude: Longitude:			
QtrQtr: SWNW	Sec: 8	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

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? No
Is groundwater less than 20 feet below ground surface? Yes	

Other Potential Receptors within 1/4 mile

Multiple buildings and livestock holding pens are located within ¼ mile of the wellhead.
The nearest building is located approximately 240 feet west of the wellhead.
The nearest domestic water well is located approximately 400 feet south of the wellhead.

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
Yes	SOILS	15' (N-S) x 15' (E-W) x 6' bgs	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 and preliminary flowline removal operations were completed at the Vogl 5-8A wellhead on June 21, 2023. Groundwater was not encountered in the cut and cap excavation. Visual inspection and field screening of soils around the well and associated pumping equipment was conducted following cut and cap operations, and soil samples were collected from the base of the cut and cap excavation area (WH-B01@6'), and from the locations where the flowline risers were disconnected at the wellhead (FL-B01@4') and separator (FL-B02@4'), as described in a previous Form 27-Supplemental update (Document No. 403533077). Laboratory analytical results indicated that soil impacts were present at samples WH-B01@6', FL-B01@4', and FL-B02@4' due to the 1,2,4- and 1,3,5-TMB, TPH, PAHs, barium (Ba), lead (Pb), and/or pH results above ECMC standards and/or site-specific background levels. As such, two Form 19-Initial/Supplemental Spill/Release Reports (Document Nos. 403442749 and 403442990) were submitted on June 23 and 27, 2023, respectively, and the ECMC issued Spill/Release Point IDs 484650 and 484670, respectively. Analytical results indicated that the remaining constituent concentrations in the soil samples collected during wellhead cut and cap and flowline riser removal activities were in compliance with ECMC standards and/or within the range of site-specific background levels. Excavation and site assessment activities to address remaining soil impacts at the former wellhead and flowline riser locations have not yet been initiated, and will be summarized in a forthcoming Form 27-Supplemental update.

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 June 21, 2023, soil samples were collected from the base of the cut and cap excavation area (WH-B01@6'), and from the former wellhead (FL-B01@4') and separator (FL-B02@4') flowline riser locations, as described in a previous Form 27-Supplemental update (Document No. 403533077). Analytical results indicated that soil impacts remain at all 3 sample locations due to 1,2,4- and 1,3,5-TMB, TPH, PAHs, Ba, Pb, and/or pH. Excavation and site assessment activities to address remaining soil impacts at the former wellhead and flowline riser locations have not yet been initiated, and future confirmation soil samples will be submitted for laboratory analysis of BTEX, TPH, TMB, PAHs, As, Ba, Cd, Cu, Pb, Se and pH, based on the waste characterization results for samples WH-B01@6', FL-B01@4', and FL-B02@4'.

Proposed Groundwater Sampling

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

Groundwater has not been encountered during wellhead cut and cap or flowline riser removal activities completed to-date. If groundwater is encountered during forthcoming excavation activities at the former wellhead or flowline riser locations, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4- and 1,3,5-trimethylbenzene (TMB), using standard methods appropriate for detecting the target analytes in Table 915-1.

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 June 21, 2023, soil screening was conducted at 4 sidewall locations within the cut and cap excavation area and 4 locations at the ground surface adjacent to the excavation, as described in a previous Form 27-Supplemental update (Document No. 403533077). On July 5, 2023, a soil gas survey was conducted at 5 soil vapor points (SVP01 - SVP05) installed adjacent to the former wellhead location following cut and cap operations, as described in a previous Form 27-Supplemental update (Document No. 403533077). No additional assessment or remediation activities have been conducted at this site since the previous Form 27-Supplemental was submitted to the ECMC on September 18, 2023 (Document No. 403533077). As such, no additional soil sampling results are provided in this document. Excavation and site assessment activities to address remaining soil impacts have not yet been initiated, and will be summarized in a forthcoming Form 27-Supplemental update once complete.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3

Number of soil samples exceeding 915-1 3

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 225

NA / ND

-- Highest concentration of TPH (mg/kg) 2230.77

-- Highest concentration of SAR 0.75

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

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 samples were collected from native material adjacent to the former wellhead location, as described in a previous Form 27-Supplemental update (Document No. 403533077).

☐ 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?

Historically impacted soil remains at sample locations WH-B01@6', FL-B01@4', and FL-B02@4' due to the 1,2,4- and 1,3,5-TMB, TPH, PAHs, Ba, Pb, and/or pH results above ECMC standards and/or site-specific background levels. Excavation and site assessment activities to address remaining soil impacts at the former wellhead and flowline riser locations have not yet been initiated, and will be summarized in a forthcoming Form 27-Supplemental update.

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.

Historically impacted soil remains at sample locations WH-B01@6', FL-B01@4', and FL-B02@4' due to the 1,2,4- and 1,3,5-TMB, TPH, PAHs, Ba, Pb, and/or pH results above ECMC standards and/or site-specific background levels. Excavation activities to address remaining soil impacts at the former wellhead and flowline riser locations have not yet been initiated, and no soils have been removed from the site to-date. Impacted soils will be removed and transported to a licensed disposal facility in accordance with Rules 905 and 906. Disposal records will be kept on file and available upon request.

REMEDATION 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 indicate that historically impacted soil remains at sample locations WH-B01@6', FL-B01@4', and FL-B02@4' due to the 1,2,4 - and 1,3,5-TMB, TPH, PAHs, Ba, Pb, and/or pH results above ECMC standards and/or site-specific background levels. Excavation and site assessment activities to address remaining soil impacts at the former wellhead and separator riser locations have not yet been initiated, and will be summarized in a forthcoming Form 27-Supplemental update. Based on the waste characterization results for samples WH-B01@6', FL-B01@4', and FL-B02@4', future confirmation soil samples from the wellhead and flowline riser excavation areas will be submitted for analysis of BTEX, TPH, TMB, PAHs, As, Ba, Cd, Cu, Pb, Se and pH. Estimated time to attain NFA is TBD based on the extent of impacted soil remaining.

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

☐ 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 Project Status Update

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 Colorado 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: \$ 15000

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

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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? 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 ECMC 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. Timeliness of reclamation initiation and completion will be subject to NFA, surface owner discretion and land use, and suitable ground conditions which allow for execution of surface reclamation activities so as to not cause unwarranted damages.

Is the described reclamation complete? No

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? Yes

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

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/30/2024

Proposed date of completion of Reclamation. 07/31/2024

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. 06/22/2023

Actual Spill or Release date, or date of discovery. 06/22/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/21/2023

Proposed site investigation commencement. 06/21/2023

Proposed completion of site investigation. 03/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/31/2024

Proposed date of completion of Remediation. 03/31/2024

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

No additional assessment or remediation activities have been conducted at this site since the previous Form 27-Supplemental was submitted to the ECMC on September 18, 2023 (Document No. 403533077). As such, no additional soil sampling results are provided in this document. Excavation and site assessment activities to address remaining soil impacts at the former wellhead and flowline riser locations have not yet been initiated, and will be summarized in a forthcoming Form 27-Supplemental update.

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: 12/15/2023

Email: Gregory_Hamilton@oxy.com

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

ECMC Approved: Kari Brown

Date: 03/25/2024

Remediation Project Number: 29026

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**

403619245	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403730425	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)