

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

Document Number:

403764265

Receive Date:

04/28/2024

Report taken by:

Laurel Anderson

## 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: (720) 929-4306 |
| City: DENVER                                      | State: CO                          | Zip: 80217-3779       |
| Contact Person: Erik Mickelson                    | Email: DJRemediation_Forms@oxy.com | Mobile: ( )           |

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 33761 Initial Form 27 Document #: 403621864

## 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 #: 123-21364       | County Name: WELD                          |
| Facility Name: MCCRUMB FEDERAL 10-17A          | Latitude: 40.136760 | Longitude: -104.799310 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NWSE                                   | Sec: 17             | Twp: 2N                | Range: 66W Meridian: 6 Sensitive Area? Yes |

|  |                     |                        |  |
|--|---------------------|------------------------|--|
| Facility Type: SPILL OR RELEASE                | Facility ID: 486352 | API #: _____           | County Name: WELD                          |
| Facility Name: McCrumb Fed 10-17A Wellhead     | Latitude: 40.136760 | Longitude: -104.799310 |  |
| ** correct Lat/Long if needed: Latitude: _____ |                     | Longitude: _____       |  |
| QtrQtr: NWSE                                   | Sec: 17             | Twp: 2N                | Range: 66W Meridian: 6 Sensitive Area? Yes |

|   |                |                            |                   |                               |                            |
|---|----------------|----------------------------|-------------------|-------------------------------|----------------------------|
| Facility Type: <u>SPILL OR RELEASE</u>                          |                | Facility ID: <u>486353</u> | API #: _____      | County Name: <u>WELD</u>      |                            |
| Facility Name: <u>McCrumb Fed 10-17A</u>                        |                | Latitude: <u>40.133216</u> |                   | Longitude: <u>-104.803414</u> |                            |
| ** correct Lat/Long if needed: Latitude: _____ Longitude: _____ |                |                            |                   |                               |                            |
| QtrQtr: <u>SESW</u>   | Sec: <u>17</u> | Twp: <u>2N</u>             | Range: <u>66W</u> | Meridian: <u>6</u>            | Sensitive Area? <u>Yes</u> |

## SITE CONDITIONS

|   |   |
|---|---|
| General soil type - USCS Classifications <u>SM</u>                | Most Sensitive Adjacent Land Use <u>Surface Water</u> |
| Is domestic water well within 1/4 mile? <u>Yes</u>                | Is surface water within 1/4 mile? <u>Yes</u>          |
| Is groundwater less than 20 feet below ground surface? <u>Yes</u> |   |

### Other Potential Receptors within 1/4 mile

Speer Canal 1,080 feet (ft) west. Fulton Ditch 980 ft east. Water Well 280 ft southeast. Occupied Buildings 800 ft southwest. Livestock 540 ft southeast. Agriculture.

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

|  |  |   |
|--|--|---|
| <input checked="" type="checkbox"/> <b>E&amp;P Waste</b> | <input type="checkbox"/> <b>Other E&amp;P Waste</b>  | <input type="checkbox"/> <b>Non-E&amp;P Waste</b> |
| <input checked="" type="checkbox"/> Produced Water       | <input type="checkbox"/> Workover Fluids             | _____   |
| <input checked="" type="checkbox"/> Oil                  | <input type="checkbox"/> Tank Bottoms                |   |
| <input checked="" 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                                    |
|--------------|----------------|------------------|---|
| UNDETERMINED | GROUNDWATER    | TBD              | Groundwater Samples/Laboratory Analytical Results |
| Yes          | 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.

Wellhead cut and cap operations were completed at the McCrumb Fed 10-17A wellhead on March 5, 2024. Visual inspection and field screening of soil around the wellhead and associated pumping equipment were conducted following cut and cap operations, and a soil sample (B01@6') was submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. Two sections of the flowline associated with the wellhead were removed between March 5 and March 8, 2024. Samples were collected from the locations where the flowline risers were disconnected from the wellhead (WH01-RISER@3') and from the separator (SEP01-RISER@5') and from the locations where the flowline was cut and capped (FL01@4', FL02@4', and FL03@4'). The remaining sections of flowline cannot be removed due to the proximity to an active irrigation ditch. Initial analytical results indicated that benzene, polycyclic aromatic hydrocarbon (PAH), and/or lead impacts were present at the wellhead and separator riser locations and the FL02 location. Verification samples were collected to confirm the initial results and final analytical results verified the benzene and PAH exceedances at the former risers. As such, two Form 19 Initial/Supplemental Spill/Release Reports (Document Nos. 403710436 and 403715406) were submitted on March 8 and March 13, 2024 and the ECMC issued Spill/Release Point IDs 486352 and 486353. The status of the remaining sections of flowline has been changed from active to out-of-service. The wellhead excavation and flowline are depicted on Figures 1 and 2. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively. The Form 44 is attached.

Excavation 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 March 5 and March 8, 2024, soil samples were collected from the base of the cut and cap excavation (B01@6'), from the locations where the flowline risers were disconnected from the wellhead (WH01-RISER@3') and from the separator (SEP01-RISER@5') and from the locations where the flowline was cut and capped (FL01@4', FL02@4', and FL03@4'). The samples were submitted for analysis of full list Table 915-1 constituents using ECMC-approved methods. Initial analytical results indicated that benzene, polycyclic aromatic hydrocarbon (PAH), and/or lead impacts were present at the wellhead and separator riser locations and the FL02 location. Verification samples were collected to confirm the initial results and final analytical results verified the benzene and PAH exceedances at the former risers. The laboratory reports are attached.

### **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 flowline removal activities.

### **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 ):

Between March 5 and March 8, 2024, visual inspection and field screening of soil were conducted at four sidewall locations within the cut and cap excavation area, four locations at the ground surface adjacent to the excavation, and 15 flowline potholes. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the screening locations, and no soil samples were submitted for laboratory analysis from these areas, in accordance with the ECMC Operator Guidance. A photographic log is attached.

On April 4, 2024, a soil gas survey was conducted at three soil vapor points installed adjacent to the former wellhead location following cut and cap operations. Two additional points were blocked and could not be screened. GEM 5000 field readings were all non-detect for methane at all soil vapor points. The soil vapor point locations are illustrated on Figure 1. The soil vapor field form is included as an attachment.

## **SITE INVESTIGATION REPORT**

### **SAMPLE SUMMARY**

#### **Soil**

Number of soil samples collected 11

Number of soil samples exceeding 915-1 6

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

Approximate areal extent (square feet) 175

#### **NA / ND**

-- Highest concentration of TPH (mg/kg) 4.44

-- Highest concentration of SAR 6.26

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 6

#### **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 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?

Fourteen background soil samples (Native-BG01@3' through Native-BG07@3' and Native-BG01@6' through Native-BG07@6') were collected from native material adjacent to the wellhead cut and cap excavation. Sixteen background soil samples were collected as part of the Wilson 7-17 flowline removal activities (Remediation No. 29000) located in an adjacent quarter section and similar NRCS soil type. The background soil samples were submitted for laboratory analysis of pH, specific conductivity (EC), sodium adsorption ration (SAR), boron, and metals using ECMC-approved methods. Laboratory analytical results indicate that EC, SAR, pH, boron, arsenic, barium, cadmium, copper, lead, and selenium are naturally high in the native soil. The background soil sample laboratory analytical results are summarized in Table 2. The background soil sample locations are depicted on Figure 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?

Excavation activities are ongoing. Confirmation soil sample results will be summarized in a subsequent Form 27 Supplemental report.

## 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.

Impacted soil from the wellhead cut and cap excavation and separator riser excavation will be removed and transported to a licensed disposal facility. 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 will be 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 data indicate that impacts exceeding the ECMC Table 915-1 allowable levels for benzene and PAHs remain in the former wellhead riser and separator riser locations. Excavation activities are ongoing. Groundwater was not encountered in the wellhead excavation or flowline potholes. Confirmation soil sample results will be summarized in a subsequent Form 27 Supplemental report.

### 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 ECMC 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

### 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: \$ 13500

### 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

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? ☐

Does the previous reply indicate consideration of background concentrations? ☐

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

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.

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. 03/11/2024

Actual Spill or Release date, or date of discovery. 03/11/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/05/2024

Proposed site investigation commencement. 03/05/2024

Proposed completion of site investigation. 10/22/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/05/2024

Proposed date of completion of Remediation. 10/22/2024

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: Erik Mickelson

Title: Environmental Lead

Submit Date: 04/28/2024

Email: DJRemediation\_Forms@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: Laurel Anderson

Date: 08/13/2024

Remediation Project Number: 33761

**COA Type****Description**

|       |   |
|-------|---|
|       | Operator shall analyze confirmation soil samples for all Table 915-1 Organic Contaminants of Concern until Operator has submitted sufficient characterization data to request and receive Director Approval of reduced list of contaminants of concern. |
| 1 COA |   |

**ATTACHMENT 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**

|           |                                |
|-----------|--------------------------------|
| 403764265 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403764303 | SOIL SAMPLE LOCATION MAP       |
| 403764306 | SOIL SAMPLE LOCATION MAP       |
| 403764308 | CORRESPONDENCE                 |
| 403764310 | ANALYTICAL RESULTS             |
| 403764311 | PHOTO DOCUMENTATION            |
| 403764312 | OTHER                          |
| 403766011 | SOIL SAMPLE LOCATION MAP       |

Total Attach: 8 Files

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

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

Total: 0 comment(s)