

State of Colorado
Energy & Carbon Management Commission

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403867605
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Report taken by:
Nick Cholas

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 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: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers Phone: <u>(970) 515-1727</u> Mobile: <u>()</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Eve Bugarin</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36648 Initial Form 27 Document #: 403867605

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 #: 123-11205 County Name: WELD

Facility Name: T.P.HOLTON GAS UNIT TRUE 1 Latitude: 40.083130 Longitude: -104.825280

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: SWNW Sec: 6 Twp: 1N Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: TANK BATTERY Facility ID: 446192 API #: _____ County Name: WELD

Facility Name: T.P.HOLTON GAS UNIT TRUE-61N66W 6SWNW Latitude: 40.082811 Longitude: -104.825278

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: SWNW Sec: 6 Twp: 1N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Non-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

Multiple buildings and livestock holding pens are located within ¼ mile of the wellhead.

A building is located approximately 370 feet northwest of the wellhead.

The nearest domestic water well is located approximately 320 feet to the northwest of the wellhead.

Surface water is located approximately 790 feet to the south of the wellhead.

An area with wetland characteristics is located approximately 200 feet of the wellhead.

The wellhead is located within ¼ mile of a Aquatic Native Species Conservation Waters, Mule Deer Severe Winter Range, and Mule Deer Winter Concentration Area designated high priority habitat buffers and is located within a Mule Deer Migration Corridor designated high priority habitat buffer.

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
UNDETERMINED	SOILS	TBD	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.

This form has been prepared in accordance with ECMC Rule 911.a to provide prior notice of the closure of the Holton TP GU True 1 production facility, plugging and abandonment of the Holton, TP GU True 1 wellhead, and the removal of the associated flowline. The flowline will be permanently removed. The off-location flowline system pre-removal notice was submitted under Form 44 Document No. 403843611. Visual inspection and field screening of soils will be conducted following decommissioning of the associated infrastructure, around the wellhead and associated flowline will be conducted during sampling activities. Soil vapor screening will also be performed around the wellhead. Based on these observations, soil and groundwater (if present) samples will be collected and submitted for laboratory analysis of the ECMC full Table 915-1 to determine if soils are in compliance. The topographic Site Location Map showing the geographic setting of the site is provided as Figure 1.

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 facility decommissioning, wellhead plugging and abandonment and flowline removal activities, discrete soil samples will be collected from the surfaces and excavation area(s) in accordance with ECMC Operator Guidance – Rule 911.A.(4) – Oil and Gas Facility Closure and Rules 913 and 915. Samples will be analyzed for all analytes listed in ECMC Table 915-1. Soil samples will be submitted to an accredited laboratory for analysis using standard methods appropriate for detecting the target analytes in ECMC Table 915-1. Facility infrastructure and the proposed soil screening and sample locations for the facility, wellhead and flowlines are provided on Figures 2, 3, & 4.

Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for all analytes listed in ECMC Table 915-1 Organic Compounds in Groundwater (benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (1,2,4 – TMB), and 1,3,5-tremethylbenzene (1,3,5 – TMB)) and Groundwater Inorganic Parameters (total dissolved solids (TDS), chloride, and sulfate) using standard methods appropriate for detecting the target analytes in ECMC 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):

A waste characterization profile will be developed based off the initial sampling results. All analytes detected will be included in the established waste characterization profile. Only the waste characterization profile analytes will be applied to any additional required sampling. Following cut and cap operations, a soil gas survey will be conducted utilizing a maximum of five (5) soil vapor points located adjacent to each former wellhead location. The proposed soil vapor point locations are illustrated on Figure 2.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1
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 > 915-1
Vertical Extent > 915-1 (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 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?

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, soil 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 912.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 ECOM via a supplemental Form 27 in accordance with Rule 913. If reportable impacts are not encountered, a supplemental Form 27 requesting closure will be submitted within 90 days following completion of sampling activities. 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

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Excavate and offsite disposal

Chemical oxidation
 Air sparge / Soil vapor extraction
 Natural Attenuation
 Other _____

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: \$ 24000 _____

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: _____

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. 05/29/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/31/2024

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

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

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

Signed: Eve Bugarin

Title: Environmental Advisor

Submit Date: 07/30/2024

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: Nick Cholas

Date: 08/14/2024

Remediation Project Number: 36648

COA Type**Description**

	If analytes are detected in the initial waste characterization sample(s), even if they are at a concentration below the respective allowable level outlined in Table 915-1, Operator shall collect confirmation samples for analysis of all Table 915-1 Contaminants of Concern until Operator has submitted sufficient characterization data to request and receive Director Approval of a reduced list of contaminants of concern.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze all proposed soil samples for complete Table 915-1 Contaminants of Concern: TPH (C6-C36), Organic Compounds in Soil, metals, and Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (90 days).
3 COAs	

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**

403867605	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403867763	SOIL SAMPLE LOCATION MAP
403867768	SOIL SAMPLE LOCATION MAP
403867770	OTHER
403867771	SITE MAP
403870486	SOIL SAMPLE LOCATION MAP
403890011	FORM 27-INITIAL-SUBMITTED

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)