

State of Colorado  
Energy & Carbon Management Commission

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05/21/2024

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) 366-3500
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Ariana Ochoa	Email: DJRemediation_Forms@oxy.com	Mobile: (713) 350-4906

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 33613 Initial Form 27 Document #: 403632178

#### 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 #: 123-14801	County Name: WELD
Facility Name: ROBERT E BALDWIN UNIT 2	Latitude: 40.172350	Longitude: -104.900350	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 4	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 327522	API #: _____	County Name: WELD
Facility Name: ROBERT E BALDWIN UNIT-62N67W 4NWNW	Latitude: 40.172350	Longitude: -104.900350	
** correct Lat/Long if needed: Latitude: 40.172336		Longitude: -104.900573	
QtrQtr: NWNW	Sec: 4	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SM

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

Domestic water well: approximately 625' NW  
Surface Water: approximately 50' W and 1125' SE  
Wetlands: multiple within 1/4 mile  
Livestock: none  
Occupied Building: approximately 640' NE

## 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	GROUNDWATER	No groundwater encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	89' (N-S) x 54' (E-W) x 4' 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.

Decommissioning activities were completed at the Dodero3-4/MCCLA/BAL production facility on April 3, 2024. Visual inspection and field screening of soils at one separator, one meter house, one produced water vessel (PWV), one emission control device (ECD), and five aboveground storage tanks (AST) was conducted following removal activities and soil samples were submitted for laboratory analysis to determine if a release occurred.

Wellhead cut and cap operations and flowline removal activities were completed at the Baldwin, Robert Unit 2 wellhead on February 21, 2024. Visual inspection and field screening of soils around the wellheads and associated flowlines was conducted following wellhead cut and cap operations and soil samples were submitted for laboratory analysis to determine if a release occurred. The removal of the associated flowlines was completed from February 21 - April 8, 2024. Soil samples were collected from the locations where the flowline risers were disconnected at the wellhead and separator, and flowline directional change.

Laboratory analytical results indicated that the TMBs, 1-methylnaphthalene, 2-methylnaphthalene, benzo(a)anthracene, and naphthalene concentrations in soil samples AST-B03@3" and AST-B04@3" collected at the Dodero3-4/MCCLA/BAL production facility exceeded the applicable ECOMC Table 915-1 standards. As such, the soil impacts were reported under the Form 19-Initial Spill/Release Report (Document No. 403744079) was submitted on April 5, 2024, and the ECOMC issued Spill/Release Point ID 486445 for this release. 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 soil sample locations are illustrated on Figure 3 and the facility on Figures 4 and 5.

### 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 11, 2024, excavation activities were conducted to address soil impacts above the liner at the former AST and confirmation soil samples were collected beneath the former liner at a depth of 4' below ground surface (bgs). Based on waste characterization results (AST-B03@3", AST-B04@3"), the soil samples were submitted for laboratory analysis of the ECOMC Table 915-1 using ECOMC-approved methods. Analytical results for the soil samples collected from the final excavation extents were in compliance with the applicable ECOMC Table 915-1 standards and/or within background limits. Soil analytical results are presented in Table 2-5. The laboratory analytical reports are 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 encountered not encountered during decommissioning or remediation 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 ):

On February 21, through April 11, 2024, visual inspection and field screening of soils was conducted at 4 sidewall locations within the cut and cap excavation area, 4 locations at the ground surface adjacent to the wellhead excavation, 6 flowline removal potholes, 3 sidewalls of the PWV excavation, one ECD, one former meter house, and 5 former AST locations. 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 ECOM Operator Guidance. On April 1, 2024, a soil gas survey was conducted at 4 soil vapor points (SVP02-SVP05) installed adjacent to the former wellhead location following cut and cap operations. SVP-01 was unable to be screened due to a pump flow obstruction. GEM 5000 field readings were non-detect for methane at all 4 soil vapor points.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

#### Soil

Number of soil samples collected 40

Number of soil samples exceeding 915-1 20

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

Approximate areal extent (square feet) 4806

#### NA / ND

-- Highest concentration of TPH (mg/kg) 426.53

-- Highest concentration of SAR 3.3

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

#### 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?

Background soil samples WH-BG01 through WH-BG05, AST-BG01 through AST-BG03, and PW-BG01 through PW-BG03 were collected from native material adjacent to the wellhead cut and cap excavations and facility at depths ranging from 3" to 6' bgs. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters and Table 915-1 metals using standard methods appropriate for detecting target analytes in Table 915-1. Analytical results for the background soil samples are presented in Tables 3 and 5.

☐ 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.

Between February 21 and April 11, 2024, approximately 780 cubic yards of impacted material were excavated and transported to the Front Range Landfill located in Erie, Colorado for disposal. The excavation area 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 results indicate that constituent concentrations in the soil samples collected from the final excavation extents were in compliance with ECMC Table 915-1 standards and/or within background limits. Groundwater was encountered not encountered during decommissioning or remediation activities. Based on the analytical and soil screening 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

☒ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) 780

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ 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

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

### 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 & 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: \$ 0

### 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:

None.

Volume of E&P Waste (solid) in cubic yards 780

E&P waste (solid) description impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Front Range Landfill located in Erie, Colorado

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

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? 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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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.

This 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. 04/21/2025

Proposed date of completion of Reclamation. 05/21/2025

## 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. 12/19/2023

Actual Spill or Release date, or date of discovery. 04/04/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/21/2024

Proposed site investigation commencement. 02/21/2024

Proposed completion of site investigation. 04/11/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/21/2024

Proposed date of completion of Remediation. 04/11/2024

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: Ariana Ochoa

Title: Sr. HSE Advisor

Submit Date: 05/21/2024

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: Kari Brown

Date: 08/15/2024

Remediation Project Number: 33613

**COA Type****Description**

	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>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.</p>
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**

403798226	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403798737	ANALYTICAL RESULTS
403798740	ANALYTICAL RESULTS
403798742	SITE MAP
403798744	SOIL SAMPLE LOCATION MAP
403798745	SOIL SAMPLE LOCATION MAP
403798746	SOIL SAMPLE LOCATION MAP
403798747	SOIL SAMPLE LOCATION MAP
403798752	PHOTO DOCUMENTATION
403798753	PHOTO DOCUMENTATION
403890984	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 11 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)