

State of Colorado
Energy & Carbon Management Commission

1120 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 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) 515-1110</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>Macy Kiel</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32195 Initial Form 27 Document #: 403502872

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: <u>WELL</u>	Facility ID: _____	API #: <u>123-14992</u>	County Name: <u>WELD</u>
Facility Name: <u>STATE OF COLORADO /AM/ 4</u>	Latitude: <u>40.222122</u>	Longitude: <u>-104.891875</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>16</u>	Twp: <u>3N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-22247</u>	County Name: <u>WELD</u>
Facility Name: <u>DAVIS STATE 20-16</u>	Latitude: <u>40.221900</u>	Longitude: <u>-104.891658</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>3N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Livestock

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

Livestock 410 feet (ft) east. Water well 1,130 ft northeast. Agriculture 1,270 ft south. The separator riser associated with this project is located within a 1/2-mile Bald Eagle active nest site high priority habitat (HPH) and the site is located within the Mule Deer Severe Winter Range HPH and Mule Deer Migration Corridor (HPH).

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	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 St of Colo AM 4 wellhead on November 28, 2023. Groundwater was not encountered in the wellhead cut and cap excavation. Visual inspection and field screening of soils around the wellhead and associated pumping equipment was conducted following cut and cap operations, and a soil sample [B01@6' (AM 4)] was submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. The flowlines associated with the Davis St 20-16 and St of Colo AM 4 wellheads were removed between November 27 and November 29, 2023, and soil samples were collected from the locations where the flowline risers were disconnected from the wellheads [WH01-RISER@3' (20-16) and WH01-RISER@3' (AM 4)] and from the locations where the flowlines turned at sharp angles (FL01@4', FL02@3', and FL03@4'). The samples were submitted for laboratory analysis of full list Table 915-1 constituents to determine if a release occurred. Initial analytical results indicated that pH exceeding the ECMC Table 915-1 allowable levels and background were present at the St of Colo AM 4 wellhead and the FL01 location. Verification samples were collected to confirm the initial results. Final analytical results indicate that constituent concentrations were within the Table 915-1 allowable levels or site-specific background levels. The wellhead excavation and flowlines are depicted on Figures 1 and 2. The PID readings and soil sample results are summarized in Tables 1 and 2. The Form 44 is attached.

Davis St 20-16 wellhead cut and cap activities are pending. Separator riser sampling is pending due to the location within a 1/2-mile Bald Eagle active nest HPH 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 November 27 and November 29, 2023, soil samples were collected from the base of the St of Colo AM 4 wellhead cut and cap excavation [B01@6' (AM 4)], from the locations where the flowline risers were disconnected from the wellheads [WH01-RISER@3' (20-16) and WH01-RISER@3' (AM 4)] and from the locations where the flowlines turned at sharp angles (FL01@4', FL02@3', and FL03@4'). The samples were submitted for laboratory analysis of full list Table 915-1 constituents using ECMC-approved methods. Initial analytical results indicated that pH exceeding the ECMC Table 915-1 allowable levels and background were present at the St of Colo AM 4 wellhead and the FL01 location. Verification samples were collected to confirm the initial results. Final analytical results indicate that constituent concentrations were within the Table 915-1 allowable levels or site-specific background levels. 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 November 27 and November 29, 2023, visual inspection and field screening of soils were conducted at four sidewall locations within the St of Colo AM 4 wellhead cut and cap excavation area, four locations at the ground surface adjacent to the excavation, and 14 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 ECOM Operator Guidance. A photographic log is attached.

On December 1, 2023, a soil gas survey was conducted at five soil vapor points installed adjacent to the former St of Colo AM 4 wellhead location following cut and cap operations. 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 8

Number of soil samples exceeding 915-1 8

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

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 4.26

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?

Twelve background soil samples (NATIVE-BG01@3' through NATIVE-BG03@3', NATIVE-BG01@6' through NATIVE-BG03@6', Native-BG04@2.5' through Native-BG06@2.5' and Native-BG04@5' through Native-BG06@5') were collected from the native material adjacent to the wellhead cut and cap excavation. Twelve background soil samples were collected as part of the Dantzker 10-16/Daven O SA facility decommissioning activities (Remediation No. 30454) located in the same quarter section and a similar NRCS soil type. The background soil samples were submitted for laboratory analysis of EC, SAR, pH, boron, and/or Table 915-1 metals using ECOM-approved methods. Laboratory analytical results indicate that levels of EC, SAR, pH, arsenic, barium, lead and selenium are naturally high in the native soil. Background soil sample laboratory analytical results are summarized in Table 2. 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?

Davis St 20-16 wellhead cut and cap activities are pending. Separator riser sampling is pending due to the location within a 1/2-mile Bald Eagle active nest HPH and 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.

Final laboratory analytical results for soil samples collected from the base of the St of Colo AM 4 wellhead cut and cap excavation [B01@6' (AM 4)], from the locations where the flowline risers were disconnected from the wellheads [WH01-RISER@3' (20-16) and WH01-RISER@3' (AM 4)] and from the locations where the flowlines turned at sharp angles (FL01@4', FL02@3', and FL03@4') were within the ECMC Table 915-1 allowable levels or site-specific background levels; therefore, no soil was removed from the site during St of Colo AM 4 wellhead cut and cap activities or flowline removal activities. 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.

Final laboratory analytical results for soil samples collected from the base of the St of Colo AM 4 wellhead cut and cap excavation [B01@6' (AM 4)], from the locations where the flowline risers were disconnected from the wellheads [WH01-RISER@3' (20-16) and WH01-RISER@3' (AM 4)] and from the locations where the flowlines turned at sharp angles (FL01@4', FL02@3', and FL03@4') were within the ECMC Table 915-1 allowable levels or site-specific background levels. Davis St 20-16 wellhead cut and cap activities are pending. Separator riser sampling is pending due to the location within a 1/2-mile Bald Eagle active nest HPH and will be summarized in a subsequent Form 27 Supplemental report.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ 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.

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. 08/09/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/27/2023

Proposed site investigation commencement. 11/27/2023

Proposed completion of site investigation. 12/19/2024

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: Macy Kiel

Title: HSE Advisor

Submit Date: 06/28/2024

Email: DJRemediation_Forms@oxy.com

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

ECMC Approved: Taylor Robinson

Date: 08/20/2024

Remediation Project Number: 32195

COA Type**Description**

	It does not appear that a floor sample was taken at the base of the Davis St 20-16 wellhead, as was proposed and approved in the 27-Initial. Operator to include that soil sample location and associated analytical data in the next Form 27-Supplemental. If this sample was not taken, Operator shall either explain why it was not taken or conduct sampling at that location.
	Operator to update Figure 2 with color for soil sample point FL01@4' to indicate it was a lab sample in the next Form 27-Supplemental.
	Upon removing a buried or partially buried vessel or cut/cap of a well, Operator will field screen a minimum four sidewall samples and one base sample in the excavation. Operator will collect the base sample from the center of the partially buried vessel/well footprint or areas of observed impact based on visual and olfactory inspection.
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**

403829664	FORM 27-SUPPLEMENTAL-SUBMITTED
403834728	CORRESPONDENCE
403834733	PHOTO DOCUMENTATION
403834734	OTHER
403836483	ANALYTICAL RESULTS
403840472	SOIL SAMPLE LOCATION MAP
403840473	SOIL SAMPLE LOCATION MAP
403840474	SOIL SAMPLE LOCATION MAP

Total Attach: 8 Files

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

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

Total: 0 comment(s)