

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

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403786879

Receive Date:

05/30/2024

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: (970) 515-1110
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Macy Kiel	Email: DJRemediation_Forms@oxy.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22016 Initial Form 27 Document #: 402957537

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 #: 123-31521	County Name: WELD
Facility Name: COTTONWOOD 11-33	Latitude: 40.092354	Longitude: -104.788414	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 33	Twp: 2N	Range: 66W
Meridian: 6	Sensitive Area? Yes		

Facility Type: WELL	Facility ID: _____	API #: 123-31526	County Name: WELD
Facility Name: COTTONWOOD 12-33	Latitude: 40.092288	Longitude: -104.788496	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 33	Twp: 2N	Range: 66W
Meridian: 6	Sensitive Area? Yes		

Facility Type: WELL		Facility ID: _____		API #: 123-31541		County Name: WELD	
Facility Name: COTTONWOOD 33-33		Latitude: 40.092253		Longitude: -104.788545			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: NWSW	Sec: 33	Twp: 2N	Range: 66W	Meridian: 6	Sensitive Area?	Yes	

Facility Type: WELL		Facility ID: _____		API #: 123-31542		County Name: WELD	
Facility Name: COTTONWOOD 32-33		Latitude: 40.092331		Longitude: -104.788446			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: NWSW	Sec: 33	Twp: 2N	Range: 66W	Meridian: 6	Sensitive Area?	Yes	

Facility Type: WELL		Facility ID: _____		API #: 123-31544		County Name: WELD	
Facility Name: COTTONWOOD 13-33		Latitude: 40.092309		Longitude: -104.788471			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: NWSW	Sec: 33	Twp: 2N	Range: 66W	Meridian: 6	Sensitive Area?	Yes	

Facility Type: WELL		Facility ID: _____		API #: 123-31548		County Name: WELD	
Facility Name: COTTONWOOD 34-33		Latitude: 40.092272		Longitude: -104.788518			
		** correct Lat/Long if needed: Latitude: _____		Longitude: _____			
QtrQtr: NWSW	Sec: 33	Twp: 2N	Range: 66W	Meridian: 6	Sensitive Area?	Yes	

Facility Type: FLOWLINE		Facility ID: 417179		API #: _____		County Name: WELD	
Facility Name: COTTONWOOD TANK BATTERY 12-33		Latitude: 40.089717		Longitude: -104.788849			
		** correct Lat/Long if needed: Latitude: 40.089843		Longitude: -104.788764			
QtrQtr: SWSW	Sec: 33	Twp: 2N	Range: 66W	Meridian: 6	Sensitive Area?	Yes	

SITE CONDITIONS

General soil type - USCS Classifications SW _____ 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 wellheads.
 The nearest building is located approximately 960 feet northwest of the wellheads.
 The nearest domestic water well is located approximately 1,180 feet south of the wellheads.
 Surface water is located approximately 1,020 feet southeast of the wellheads.

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 taken to abate, investigate, and/or remediate impacts associated with E&P Waste.

Wellhead cut and cap operations were completed at the Cottonwood 11, 12, 13, 32, 33, 34-33 wellheads on March 4, 2022. Groundwater was not encountered in the wellhead cut and cap excavation area. Visual inspection and field screening of soils around the wells and associated pumping equipment was conducted following cut and cap operations, and soil samples were collected as described in a previous Form 27-Supplemental update (Doc. 403110421). The flowlines associated with these wellheads were removed on April 14 through 21, 2022. Soil samples were collected as described in a previous Form 27-Supplemental update (Doc. 403110421). Analytical results indicate impacts remain at the former wellheads due to elevated pH. The remaining analytical results for the soil samples collected during wellhead cut and cap and flowline removal operations were in compliance with ECOM standards.

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 March 4 through April 21, 2022, 17 soil samples were collected from the excavation and flowline removal potholes as described in a previous Form 27-Supplemental update (Doc. 403110421). Analytical results indicated that soil impacts remained in the wellhead excavation areas due to pH only. Kerr-McGee is currently evaluating potential remediation strategies and/or alternative paths to closure, including possible submittal of a reclamation plan, which will be detailed in a forthcoming Form 27-Supplemental update.

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 operations to date. If groundwater is encountered during ongoing site assessment activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-TMB, using standard methods appropriate for detecting the target analytes in ECOM 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):

No additional site assessment or remediation activities have been completed since the previous Form 27 was submitted to the ECOM (Doc. 403110421). Site assessment activities are ongoing and will be summarized in a forthcoming Form 27-Supplemental update. Kerr-McGee is currently evaluating potential remediation strategies and/or alternative paths to closure, including possible submittal of a reclamation plan and/or collection of additional background samples, which will be detailed in a forthcoming Form 27-Supplemental update.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 17

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

-- Highest concentration of TPH (mg/kg) 322.27

-- Highest concentration of SAR 7.71

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?

Six (6) background soil samples were collected from undisturbed native material adjacent to the wellhead excavation area, at comparable depths and soil composition to the confirmation soil samples as the confirmation soil samples as described in a previous Form 27-Supplemental update (Doc. 403110421). Additional background soil sampling activities may be conducted for comparison to the elevated pH results remaining in the wellhead excavation areas.

☐ 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?

Impacted soil remains at the site due to elevated pH. Site assessment activities are currently ongoing, and will be summarized in a forthcoming Form 27-Supplemental update. Kerr-McGee is currently evaluating potential remediation strategies and/or alternative paths to closure, including possible submittal of a reclamation plan, which will be detailed 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.

Impacted soil remains at the site due to elevated pH. Site assessment activities are ongoing and will be summarized in a forthcoming Form 27-Supplemental update. Kerr-McGee is currently evaluating potential remediation strategies and/or alternative paths to closure, including possible submittal of a reclamation plan and/or collection of additional background samples, which will be detailed in a forthcoming Form 27-Supplemental update.

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.

Impacted soil remains at the site due to elevated pH. Site assessment activities are ongoing and will be summarized in a forthcoming Form 27-Supplemental update. Kerr-McGee is currently evaluating potential remediation strategies and/or alternative paths to closure, including possible submittal of a reclamation plan and/or collection of additional background samples, which will be detailed in a forthcoming Form 27-Supplemental update. Estimated time to attain NFA is TBD, based on the efficacy of the selected remediation strategies, and the extent of impacted soil.

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 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 Oil and Gas Conservation 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: \$ 25000

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. 03/31/2025

Proposed date of completion of Reclamation. 04/30/2025

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. 11/18/2021

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/04/2022

Proposed site investigation commencement. 03/04/2022

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2024

Proposed date of completion of Remediation. 12/31/2024

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

Site assessment activities are ongoing and will be summarized in a forthcoming Form 27 Supplemental update. Kerr-McGee is currently evaluating potential remediation strategies and/or alternative paths to closure, including possible submittal of a reclamation plan, which will be detailed in a forthcoming Form 27-Supplemental update. Additional information will be provided in the next Form 27-Supplemental quarterly update.

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: 05/30/2024

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: Laurel Anderson

Date: 09/11/2024

Remediation Project Number: 22016

COA Type**Description**

	Operator submitted this form outside of the approved reporting schedule (Quarterly). In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days); additional violations may result in enforcement.
	ECMC has processed this form as an update; no analytical was attached thus approval of this form does not imply any agreement with comments on completion of site investigation.

2 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**

403786879	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)