

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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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) 515-1110
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Macy Kiel	Email: DJRemediation_Forms@oxy.com	Mobile: ( )

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 34630 Initial Form 27 Document #: 403688491

## 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

No Multiple Facilities

Facility Type: LOCATION	Facility ID: 317772	API #: _____	County Name: WELD
Facility Name: ROY DUTCHER UNIT-62N67W 24SWW	Latitude: 40.119200	Longitude: -104.845120	
** correct Lat/Long if needed: Latitude: 40.118009		Longitude: -104.844969	
QtrQtr: SWSW	Sec: 24	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Sand Hills Lake

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: multiple domestic wells within 1/4 mile

Surface water: approximately 130' SE, 600' SW

Wetlands: multiple areas with wetland characteristics are located within 1/4 mile

Spring: none

Livestock: none

Occupied Building: multiple occupied buildings within 1/4 mile

High Priority Habitats: within 1/4 mile of the boundary of Bald Eagle Active Nest Site Half Mile 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	Groundwater not encountered	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.

Decommissioning activities were completed at the Dutcher Roy UT1/Sali production facility on July 1, 2024. Visual inspection and field screening of soils at one separator, one meter house, one produced water vessel (PWV), one emission control device (ECD), three dumphine removal potholes, and one aboveground storage tank (AST) were conducted following removal activities and soil samples (SEP-B01@5', SEP-B02@5', AST-B01@6", PW-B01@5', PW-W01@2', DL-B02@5') were submitted for laboratory analysis to determine if a release occurred. Initial laboratory analytical results indicated that the pH, arsenic, and/or lead concentrations in the soil samples exceeded the applicable ECMC Table 915-1 standards and background limits. As such, verification soil samples have been or are in the process of being collected to verify the pH, arsenic, and/or lead in the soil samples and lab results are pending. The laboratory analytical results for the verification soil samples will be summarized in a forthcoming quarterly Form 27-Supplemental Site Investigation and Remediation Workplan. 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 soil sample and field screening locations are illustrated on Figure 2. Laboratory analytical reports are provided as Attachment A. The field notes and a photographic log are provided as Attachment B.

## 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 July 1, 2024, soil samples were collected from the base (PW-B01@5') and sidewall (PW-W01@2') of the PWV excavation, the separator excavation (SEP-B01@5', SEP-B02@5'), beneath the former AST (AST-B01@6"), and from a dumphine removal pothole excavation (DL-B02@5'). The soil samples were submitted for laboratory analysis of the full ECMC Table 915-1 analytical suite using ECMC-approved methods. Initial laboratory analytical results indicated that the pH, arsenic, and/or lead concentrations in the soil samples exceeded the applicable ECMC Table 915-1 standards and background limits. As such, verification soil samples have been or are in the process of being collected to verify the pH, arsenic, and/or lead in the soil samples and lab results are pending. Soil analytical results are summarized in Tables 2 through 5.

### Proposed Groundwater Sampling

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

Groundwater was not encountered during initial decommissioning activities. If groundwater is encountered during remaining assessment 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-trimethylbenzene (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 ):

On July 1, 2024, visual inspections and field screening of soils was conducted at three sidewalls of the PWV excavation, one ECD, one meter house, beneath one former AST, and at two dumphine removal pothole excavations. Based on the inspection and screening results, hydrocarbon-impacted soils were not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the ECMC Operator Guidance for Oil & Gas Facility Closure document.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 11

Number of soil samples exceeding 915-1 9

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 4.66

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 PW-BG01 - PW-BG03 and AST-BG01 - AST-BG03 were collected from non-impacted native material nearby the tank battery at depths ranging from approximately 0.5' - 6' bgs. Background soil samples from the Salinas 11-24A wellhead have been included (located approximately 1700' northeast, collected from similar land use, depths, and soil type). The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters and ECMC Table 915-1 Metals using standard methods appropriate for detecting target analytes in ECMC Table 915-1. Analytical results for the background soil samples are presented in Tables 3 and 5. The background locations are illustrated on Figures 2 through 4.

☐ 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?

Assessment activities are ongoing. Verification soil samples have been or are in the process of being collected to verify the pH, arsenic, and lead concentrations in the soil samples (SEP-B01@5', SEP-B02@5', AST-B01@6", PW-B01@5', PW-W01@2', and DL-B02@5'). The laboratory analytical results of the verification soil samples will be summarized in a forthcoming quarterly Form 27-Supplemental Site Investigation and Remediation Workplan.

## 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.

Assessment activities are ongoing. Verification soil samples have been or are in the process of being collected to verify the pH, arsenic, and lead concentrations in the soil samples (SEP-B01@5', SEP-B02@5', AST-B01@6", PW-B01@5', PW-W01@2', and DL-B02@5'). The laboratory analytical results of the verification soil samples will be summarized in a forthcoming quarterly Form 27-Supplemental Site Investigation and Remediation Workplan.

## REMEDIAL ACTION 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.

Assessment activities are ongoing. Verification soil samples have been or are in the process of being collected to verify the pH, arsenic, and lead concentrations in the soil samples (SEP-B01@5', SEP-B02@5', AST-B01@6", PW-B01@5', PW-W01@2', and DL-B02@5'). The laboratory analytical results of the verification soil samples will be summarized in a forthcoming quarterly Form 27-Supplemental Site Investigation and Remediation Workplan.

**Soil Remediation Summary**

<input type="checkbox"/> <b>In Situ</b>	<input type="checkbox"/> <b>Ex Situ</b>
_____ 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.

## 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 & 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. 01/09/2024

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/01/2024

Proposed site investigation commencement. 07/01/2024

Proposed completion of site investigation. 08/31/2024

### 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**

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: 08/12/2024

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: 10/24/2024

Remediation Project Number: 34630

**COA Type****Description**

0 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**

403881502	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403881988	PHOTO DOCUMENTATION
403881989	SITE MAP
403881993	SOIL SAMPLE LOCATION MAP
403881994	SOIL SAMPLE LOCATION MAP
403881996	ANALYTICAL RESULTS
403882021	ANALYTICAL RESULTS
403883339	SOIL SAMPLE LOCATION MAP
403969168	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)