

State of Colorado
Energy & Carbon Management Commission

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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
Address: <u>P O BOX 173779</u>		Phone: <u>(720) 929-4306</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		Mobile: <u>()</u>
Contact Person: <u>Erik Mickelson</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29852 Initial Form 27 Document #: 403436936

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>123-14695</u>	County Name: <u>WELD</u>
Facility Name: <u>HSR-FEDERAL 11-36</u>	Latitude: <u>40.179610</u>	Longitude: <u>-104.727520</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>36</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>484644</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-Fed 11-36 Wellhead</u>	Latitude: <u>40.179610</u>	Longitude: <u>-104.727520</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>36</u>	Twp: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Rangeland _____

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

Water well 140 feet (ft) north. Commercial Building 930 ft northeast. No other potential receptors were identified within a 1/4 mile radius.

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	See attached.	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.

On June 20, 2023, while conducting wellhead plugging and abandonment activities at the HSR-Fed 11-36 wellhead, daylighting fluid from the subsurface was discovered adjacent to the wellhead. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 403439971) was submitted on June 23, 2023, and the ECOM issued Spill/Release Point ID 484644. One soil sample (SS01@2') was collected for waste profiling purposes and was submitted for analysis of full list Table 915-1 constituents. Results indicated lead concentrations above Table 915-1 allowable levels and background levels were present in the release area. Wellhead cut and cap operations were completed at the wellhead on July 19, 2023. Groundwater was not encountered in the wellhead cut and cap excavation. Visual inspection and field screening of soil around the wellhead and associated pumping equipment were conducted following cut and cap operations, and soil samples were submitted for analysis of the site-specific waste profile. Sample B01@6.5' was also submitted for analysis of the reduced list Table 915-1 constituents as approved in the Form 27 Initial dated June 19, 2023 (Document No. 403436936). A portion of the flowline associated with the wellhead was removed on July 19, 2023, and samples were collected from the locations where the flowline risers were disconnected from the wellhead (WH01-RISER@5') and from the separator (SEP01-RISER@4'). The remaining portion of the flowline has been abandoned-in-place due to active lines running in the same trench. An investigation along the abandoned-in-place portion of the flowline was conducted on June 5 and July 17, 2024, and samples were collected from the locations where the flowline changed directions (FL01@5', FL02@4', and FL03@4'). The flowline samples were submitted for analysis of reduced list Table 915-1 constituents, to determine if a release occurred. Analytical results indicated that results were within allowable levels or within background.

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):

From June 20 through September 14, 2023, excavation activities were conducted to address soil impacts at the release location and confirmation soil samples were collected from the base and sidewalls of the final excavation extent at approximately 9 feet below ground surface (bgs) and 3 feet bgs, respectively. The confirmation soil samples were submitted for laboratory analysis of pH, arsenic, barium, cadmium, and lead using ECOM-approved methods. Analytical results indicated that soil at the final excavation extents was within Table 915-1 allowable levels or within background levels. The wellhead excavation and flowline are depicted on Figures 1 and 2. The PID readings and soil sample results are summarized in Tables 1 and 2. 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 operations.

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 19, 2023, visual inspection and field screening of soils were conducted at four sidewall locations within the cut and cap excavation area, four locations at the ground surface adjacent to the excavation, and eight 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 July 24, 2023, a soil gas survey was conducted at five soil vapor points installed adjacent to the former 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 15
Number of soil samples exceeding 915-1 11
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 440

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 2.11
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 9

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?

Twelve background soil samples (Native-BG01@0.5' through Native-BG04@0.5', Native-BG05@3' through Native-BG08@3', and Native-BG05@6' through Native-BG08@6') were collected from native material adjacent to the wellhead cut and cap excavation. Four background soil samples were collected during the USA 19-36 wellhead decommissioning activities (Remediation No. 23478), located in the same quarter section and NRCS soil type. The background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and metals using ECOMC-approved methods. Laboratory analytical results indicate that SAR, pH, arsenic, barium, and selenium are naturally high in the native soil. Analytical results from the background soil samples are presented in Table 2. The 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?

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.

Approximately 200 cubic yards of impacted soil were removed from the site and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Disposal records are kept on file and available upon request. The wellhead cut and cap excavation area has been 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 data indicate that impacted soil in the release excavation area has been remediated to be in compliance with the ECMC Table 915-1 standards or within background. Groundwater was not encountered in the wellhead excavation area. 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) _____ 200

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

No _____ 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 NFA Status 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 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: \$ 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:

N/A

Volume of E&P Waste (solid) in cubic yards 200

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill in Keenesburg, CO

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? 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 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. 08/20/2025

Proposed date of completion of Reclamation. 09/20/2025

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. 06/20/2023

Actual Spill or Release date, or date of discovery. 06/20/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/20/2023

Proposed site investigation commencement. 06/20/2023

Proposed completion of site investigation. 07/17/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/20/2023

Proposed date of completion of Remediation. 09/14/2023

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

Based on the analytical and soil screening data provided herein, assessment is complete, and Kerr-McGee is requesting a NFA determination for this location.

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

Signed: Erik Mickelson

Title: Environmental Lead

Submit Date: 09/27/2024

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: Taylor Robinson

Date: 12/03/2024

Remediation Project Number: 29852

COA Type**Description**

	Closure request removed. Operator shall analyze all soil samples that were taken after the 8/8/23 requirement for the full list of Table 915-1 contaminants.
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**

403928772	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
403930373	SOIL SAMPLE LOCATION MAP
403930379	CORRESPONDENCE
403930382	PHOTO DOCUMENTATION
403930384	OTHER
403931317	SOIL SAMPLE LOCATION MAP
403931318	SOIL SAMPLE LOCATION MAP
403931321	ANALYTICAL RESULTS
404013439	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

Environmental	This Project appears to meet closure requires except several soil samples that were taken after the 8/8/23 requirement for full list of Table 915-1 list of contaminants were not analyzed for the full list.	12/03/2024
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Total: 1 comment(s)