

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
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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>(970) 515-1110</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		Mobile: <u>()</u>
Contact Person: <u>Macy Kiel</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36648 Initial Form 27 Document #: 403867605

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>123-11205</u>	County Name: <u>WELD</u>
Facility Name: <u>T.P.HOLTON GAS UNIT TRUE 1</u>	Latitude: <u>40.083130</u>	Longitude: <u>-104.825280</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>6</u>	Twp: <u>1N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>446192</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>T.P.HOLTON GAS UNIT TRUE-61N66W 6SWNW</u>	Latitude: <u>40.082811</u>	Longitude: <u>-104.825278</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>6</u>	Twp: <u>1N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Surface Water

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

South Platte River 1170 feet (ft) east. An area with wetland characteristics is located approximately 770 ft south. Water well 320 ft northwest. Pearson Park 190 ft east. Occupied Buildings 330 ft northwest. Livestock 390 ft northwest. Commercial Buildings 1050 ft northeast. State Highway 1110 ft south. The site is located in a 100 year floodplain. The site is located within a Mule Deer Migration Corridor and within a ¼ mile of the boundary of an Aquatic Native Species Conservation Waters, a Mule Deer Severe Winter Range, and a Mule Deer Winter Concentration High Priority Habitat (HPH) areas.

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 Holton, TP GU True 1 wellhead on October 9, 2024. 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 a soil sample [B01(True 1)@6'] was submitted for analysis of full list ECMC Table 915-1 constituents, to determine if a release occurred. Portions of the flowline associated with the wellhead were removed on October 9, 2024, and soil samples were collected from the locations where the flowline riser was disconnected from the wellhead [WH01-RISER(True 1)@3'] and from where the flowline changed directions [FL01(True 1)@3']. The samples were submitted for laboratory analysis of full list Table 915-1 constituents to determine if a release occurred. Laboratory analytical results for all samples are pending. A table summarizing final lab results will be provided in a subsequent Form 27 Supplemental report. The wellhead excavation and flowline are depicted on Figures 1 and 2. The PID readings is summarized in Table 1. The Form 44 is attached.

Additional flowline removal and facility decommissioning activities are pending 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):

On October 9, 2024, soil samples were collected from the base of the cut and cap excavation [B01(True 1)@6'], from the locations where the flowline riser was disconnected from the wellhead [WH01-RISER(True 1)@3'], and from where the flowline changed directions [FL01(True 1)@3']. The samples were submitted for laboratory analysis of full list ECMC Table 915-1 constituents, using ECMC-approved methods. Laboratory analytical results for all soil samples are pending. A table summarizing final lab results will be provided in a subsequent Form 27 Supplemental report. The wellhead excavation and flowline are depicted on Figures 1 and 2.

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.

If groundwater is encountered during flowline removal and facility decommissioning activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB, 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):

[Empty box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

On October 9, 2024, visual inspection and field screening of soil were conducted at 4 sidewall locations within the cut and cap excavation area, 4 locations at the ground surface adjacent to the cut and cap excavation, and at 2 flowline pothole 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 ECMC Operator Guidance. A photo log is attached.

On October 23, 2024, a soil gas survey was conducted at three soil vapor points (SVPs) installed adjacent to the former wellhead location following cut and cap operations. Two SVPs were blocked and could not be screened. GEM 5000 field readings were all non-detect for methane at all other SVPs. The soil vapor point locations are depicted on Figure 1. The soil vapor field form is attached.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 _____
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
0 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?

Ten background soil samples (NATIVE-BG01@3 through NATIVE-BG05@3' and NATIVE-BG01@6' through NATIVE-BG05@6') were collected from native material adjacent to the wellhead cut and cap excavation. The background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and ECMC Table 915-1 metals, using ECMC-approved methods. Laboratory analytical results for all background samples are pending. The background sample locations are depicted on Figure 1.

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?

Additional flowline removal and facility decommissioning activities are pending 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.

Laboratory analytical results for all soil samples are pending. If a suspected release is identified and confirmed through laboratory analysis, soils will be removed and transported to a licensed disposal facility. Disposal records will be kept on file and available upon request.

REMEDICATION 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 analytical results for all soil samples collected during wellhead cut and cap and partial flowline removal activities are pending. A table summarizing final lab results will be provided in a subsequent Form 27 Supplemental report. Groundwater was not encountered in the wellhead cut and cap excavation and flowline potholes. Additional flowline removal and facility decommissioning activities are pending and will be summarized in a subsequent Form 27 Supplemental report.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ 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.

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. 05/29/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/09/2024

Proposed site investigation commencement. 10/09/2024

Proposed completion of site investigation. 04/28/2025

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: 11/07/2024

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: Alexander Ahmadian

Date: 01/29/2025

Remediation Project Number: 36648

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**

403971446	FORM 27-SUPPLEMENTAL-SUBMITTED
403973029	SOIL SAMPLE LOCATION MAP
403973030	SOIL SAMPLE LOCATION MAP
403973032	ANALYTICAL RESULTS
403973034	PHOTO DOCUMENTATION
403973036	OTHER
403973037	CORRESPONDENCE

Total Attach: 7 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)