

State of Colorado
Energy & Carbon Management Commission

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403978940
Receive Date:
11/21/2024
Report taken by:
Grace Rollins

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>		
City: <u>DENVER</u>	State: <u>CO</u>	Phone: <u>(970) 515-1161</u>
	Zip: <u>80217-3779</u>	Mobile: <u>()</u>
Contact Person: <u>Phil Hamlin</u>	Email: <u>Phillip_Hamlin@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24484 Initial Form 27 Document #: 403116623

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>123-17901</u>	County Name: <u>WELD</u>
Facility Name: <u>WADDLE 24-10J7</u>	Latitude: <u>40.206020</u>	Longitude: <u>-104.837130</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>24</u>	Twp: <u>3N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>482910</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Waddle 24-10J7 Wellhead</u>	Latitude: <u>40.206020</u>	Longitude: <u>-104.837130</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>24</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 Surface Water and Livestock

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

Livestock surrounding; Surface water located approximately 1,100 feet (ft) west; Agriculture located approximately 200 ft north; Water wells located approximately 900 ft north and 1,300 ft southeast; Groundwater at approximately 2 ft below ground surface (bgs).

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	GROUNDWATER	See attached data.	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	See attached data.	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 Waddle 24-10J7 wellhead on August 26, 2022. 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'-WP) was submitted for analysis of reduced list Table 915-1 constituents including benzene, toluene, ethylbenzene, xylenes (BTEX), 1,2,4- and 1,3,5-trimethylbenzenes (TMBs), naphthalene, total petroleum hydrocarbons (TPH)-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO), pH, electrical conductivity (EC), sodium adsorption ratio (SAR), and boron to determine if a release occurred. Laboratory analytical results indicated that all results were within the ECMC Table 915-1 allowable levels. The flowline associated with the wellhead and a portion of the flowline associated with the Birkle #24-15L wellhead were removed on August 26, 2022, and soil samples were collected from the locations where the flowline riser was disconnected from the separator (SEP-Riser@4'-WP) and from flowline potholes containing groundwater [FL01@3', FL02@3' (Birkle #24-15L), FL03@3' (Birkle #24-15L)]. Groundwater was identified in all excavations and potholes at approximately 2 ft bgs. The samples were submitted for laboratory analysis of either reduced list Table 915-1 or full list Table 915-1 constituents to determine if a release occurred. Analytical results indicated that arsenic, barium, and lead impacts exceeded Table 915-1 allowable levels and background were present at the SEP-Riser@4'-WP and FL03@3' (Birkle #24-15L) locations. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 403150392) was submitted on September 1, 2022 and the ECMC issued Spill/Release Point ID 482910. The wellhead excavation and flowlines are depicted on Figure 1.

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 August 26, 2022, soil samples were collected from the base of the cut and cap excavation (B01@6'-WP), from the location where the flowline riser was disconnected from the separator (SEP-Riser@4'-WP), and from three flowline potholes where groundwater was observed [FL01@3', FL02@3' (Birkle #24-15L), FL03@3' (Birkle #24-15L)]. The samples were submitted for analysis of either reduced list or full list Table 915-1 constituents using ECMC-approved methods, as approved in the Form 27 Initial dated July 26, 2022 (Document No. 403116623). Results indicated that all samples collected during wellhead cut and cap and flowline removal activities were in compliance with ECMC Table 915-1 standards except for metals which will be addressed during groundwater monitoring, as approved in the Form 27 Supplementals dated November 30, 2022 and May 10, 2023 (Document Nos. 403212198 and 403333614). Therefore, further excavation was not warranted. The soil analytical results are summarized in Table 1.

Proposed Groundwater Sampling

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

On August 26, 2022, five groundwater samples were collected from the wellhead excavation, flowline potholes, and separator riser excavation for Table 915-1 analyses. Two background groundwater samples were also collected and submitted for Table 915-1 inorganic parameters. Based on the laboratory analytical results, samples GW03 and GW05, collected from the SEP-Riser@4'-WP and FL03@3' (Birkle #24-15L) locations, respectively, exceeded the ECMC Table 915-1 allowable levels for benzene. The excavation groundwater sample and background sample locations are depicted on Figure 1. The groundwater sample analytical results are summarized in Table 2.

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 August 26, 2022, visual inspection and/or field screening of soils were conducted at four sidewall locations within the cut and cap excavation area. 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.

On August 29, 2022, a soil gas survey was conducted at four 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.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>15</u>	-- Highest concentration of TPH (mg/kg) <u>223.3</u>
Number of soil samples exceeding 915-1 <u>12</u>	-- Highest concentration of SAR <u>5.26</u>
Was the areal and vertical extent of soil contamination delineated? <u>No</u>	BTEX > 915-1 <u>No</u>
Approximate areal extent (square feet) <u>255</u>	Vertical Extent > 915-1 (in feet) <u>4</u>
Groundwater	
Number of groundwater samples collected <u>15</u>	-- Highest concentration of Benzene (µg/l) <u>35</u>
Was extent of groundwater contaminated delineated? <u>Yes</u>	-- Highest concentration of Toluene (µg/l) <u>90.9</u>
Depth to groundwater (below ground surface, in feet) <u>2</u>	-- Highest concentration of Ethylbenzene (µg/l) <u>8.94</u>
Number of groundwater monitoring wells installed <u>0</u>	-- Highest concentration of Xylene (µg/l) <u>148</u>
Number of groundwater samples exceeding 915-1 <u>2</u>	NA Highest concentration of Methane (mg/l) <u></u>
Surface Water	
<u>0</u> Number of surface water samples collected	
<u></u> 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?

Three background soil samples (Native-BG01@4' through Native-BG03@4') were collected from native material adjacent to the wellhead cut and cap activities. The background soil samples were submitted for laboratory analysis of pH, EC, SAR, boron, and metals using ECMC-approved methods. Laboratory analytical results indicated that levels of arsenic are naturally high in the soil. The background soil sample analytical results are summarized in Table 1.

Two background groundwater samples (GW-BG01 and GW-BG02) were collected and submitted for Table 915-1 inorganic parameters. The background groundwater sample results are summarized in Table 2. The background groundwater 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?

Based on analytical results from the soil samples collected during monitoring well installation, additional soil assessment is needed at the site. The additional assessment activities will be conducted following the completion of groundwater monitoring so as to not damage or destroy the existing groundwater monitoring wells.

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 indicate that reduced list Table 915-1 constituent concentrations in soil samples collected from the base of the cut and cap excavation (B01@6'-WP) and from flowline potholes FL01@3' and FL02@3' (Birkle #24-15L) were in compliance with the ECMC Table 915-1 standards or below the analytical variability of background. Laboratory analytical results indicate that constituent concentrations in soil samples collected from SEP-Riser@4'-WP and FL03@3' (Birkle #24-15L) were in compliance with ECMC Table 915-1 standards except for metals which will be addressed during groundwater monitoring, as approved in the Form 27 Supplementals dated November 30, 2022 (Document No. 403212198) and May 10, 2023 (Document No. 403333614); therefore, no soils were removed from the site during wellhead cut and cap or flowline removal operations. The excavation areas were backfilled and contoured to match pre-existing site 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.

On August 26, 2024, ten groundwater monitoring wells (MW01 through MW10) were installed in order to delineate the extent and magnitude of any remaining impacts. Per the condition of approval issued by the ECMC to Document No. 403626016, one soil sample was collected from each soil boring (SB01 through SB10) and submitted for laboratory analysis of full list Table 915-1 analysis. Results indicated that benzo(a)anthracene, EC, SAR, pH, boron, arsenic, barium, cadmium, copper, lead, and/or selenium concentrations exceeding the Table 915-1 allowable levels and existing background levels were present at all locations. Based on analytical results from the soil samples collected during monitoring well installation, additional soil assessment is needed at the site. The additional assessment activities will be conducted following the completion of groundwater monitoring so as to not damage or destroy the existing groundwater monitoring wells. Soil analytical data is presented in Table 1 and the boring logs are attached.

Quarterly groundwater monitoring of the newly-installed well network was initiated on September 17, 2024. Analytical results from all monitoring wells were in compliance with Table 915-1 allowable levels and all organic constituents were below the laboratory reporting limits.

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.

In August 2024, groundwater monitoring wells MW01 through MW10 were installed at the site.

Groundwater monitoring wells MW01 through MW10 are now being sampled on a quarterly basis for the full list of analytes for groundwater in Table 915-1 constituents, dissolved arsenic, dissolved barium, dissolved cadmium, and dissolved lead. Upgradient groundwater monitoring well MW07 was established as a representative background sample for calculating the inorganic parameters in Table 915-1. Laboratory analytical results from the third quarter 2024 groundwater monitoring event were within the Table 915-1 standards or within background levels for all constituents. All dissolved arsenic, barium, cadmium, and lead concentrations were below the Water Quality Control Commission Regulation 41 allowable levels. The monitoring well locations are depicted on Figure 1. The Groundwater Elevation Contour Map generated using the September 2024 survey data is provided as Figure 2. The groundwater analytical results are summarized in Tables 2A and 2B, and the laboratory analytical reports for the September 2024 groundwater monitoring event is attached.

Groundwater monitoring will continue on a quarterly basis until a No Further Action status request is warranted.

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 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: \$ 30000 _____

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 _____

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. 08/29/2022

Actual Spill or Release date, or date of discovery. 08/29/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/26/2022

Proposed site investigation commencement. 08/26/2022

Proposed completion of site investigation. 09/17/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/26/2022

Proposed date of completion of Remediation. 12/18/2026

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: Phil Hamlin

Title: Senior Environmental Rep.

Submit Date: 11/21/2024

Email: Phillip_Hamlin@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: Grace Rollins

Date: 01/29/2025

Remediation Project Number: 24484

COA Type

Description

	<p>Per the COA on Form 27 Document # 403626016: "In accordance with Rule 914, if impacts are observed during monitoring well installation a step out monitoring well(s) shall be installed to define the horizontal extent of impacts to soil and groundwater and the monitoring wells shall be installed within 45 days of observations." Additional monitoring wells are required to define the extent of impacts over Protection of Groundwater Soil Screening Level Concentrations observed in soil boring SB-01 (MW-01) and to further characterize potential impacts to groundwater. More than one well may be required to obtain a point of compliance. The monitoring well(s) shall be installed within 45 days.</p>
	<p>Operator states: "Results indicated that benzo(a)anthracene, EC, SAR, pH, boron, arsenic, barium, cadmium, copper, lead, and/or selenium concentrations exceeding the Table 915-1 allowable levels and existing background levels were present at all locations. Based on analytical results from the soil samples collected during monitoring well installation, additional soil assessment is needed at the site." and "Results indicated that all samples collected during wellhead cut and cap and flowline removal activities were in compliance with ECMC Table 915-1 standards except for metals which will be addressed during groundwater monitoring." Operator shall clarify on the subsequent Supplemental Form 27 whether concentrations of metals in soil exceeding Table 915-1 will be addressed through additional soil assessment or through groundwater monitoring. If the Operator proposes to address the concentrations of metals in soil through groundwater monitoring, the Operator will expand the analyte list to include all metals with concentrations exceeding Table 915-1.</p>
	<p>ECMC agrees to Operator's proposal to conduct additional soil assessment following the completion groundwater monitoring, as it pertains to metals and soil suitability for reclamation. Operator shall submit proposed locations for soil samples prior to their collection for ECMC approval.</p>

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
403978940	FORM 27-SUPPLEMENTAL-SUBMITTED
403978966	ANALYTICAL RESULTS
403978967	LOGS
403978968	ANALYTICAL RESULTS
403978971	ANALYTICAL RESULTS
403978973	ANALYTICAL RESULTS
403984985	GROUND WATER ELEVATION MAP
403988772	SITE MAP

Total Attach: 8 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)