

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

Document Number:

404016889

Receive Date:

01/08/2025

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 & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37543 Initial Form 27 Document #: 403902186

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: TANK BATTERY | Facility ID: 446892 | API #: _____ | County Name: WELD |
| Facility Name: WINDELL1-13&4&5-18 O SA 34003778 | Latitude: 40.144889 | Longitude: -104.828946 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: NWNW | Sec: 18 | Twp: 2N | Range: 66W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use South Platte River

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 100 feet (ft) east. Water well 170 ft southwest. County Road 230 ft west. Areas with wetland characteristics are surrounding the facility. Mining ponds 500 ft south and 1160 ft southwest. Irrigation ditch 850 ft west. Agriculture. The site is located within a Bald Eagle Active Nest Site Half Mile, Bald Eagle Roost Site, Mule Deer Migration Corridor, Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, and Aquatic Native Species Conservation Waters High Priority Habitat (HPH) areas.

DENIED

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.

Decommissioning activities were completed at the Windell1-13&4&5-18 facility on November 12, 2024. Visual inspection and field screening of soil at one aboveground storage tank (AST), one produced water vessel (PWV), one separator, one dumphine pothole, one scrub pot, two emission control devices (ECDs), and one meter house location were conducted following removal activities. Soil samples (AST01@0.5', PWV-W01@2', PWV-B01@4', SEP01-INLET@3', and SEP01-OUTLET@3') were submitted for analysis of full list Table 915-1 constituents, to determine if a release occurred. Partial initial laboratory analytical results indicated that cadmium impacts exceeding the ECOM Table 915-1 allowable level and background level are present at the SEP01-OUTLET@3' location. A verification sample was collected at the SEP01-OUTLET location to confirm the initial results. Verification sample analytical results were within the ECOM Table 915-1 allowable level for cadmium. Final laboratory analytical results for all samples are pending. Once the final laboratory reports have been received, they will be submitted in a subsequent Form 27 Supplemental report. The facility soil sample locations are depicted on Figure 1. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively.

Assessment activities are ongoing and will be provided 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 November 12, 2024, five confirmation soil samples (AST01, PWV-W01, PWV-B01, SEP01-INLET & SEP01-OUTLET) were collected at depths ranging from 0.5 to 4 ft below ground surface (bgs). The soil samples were submitted for laboratory analysis of full list Table 915-1 constituents, using ECOM-approved methods. Partial initial laboratory analytical results indicated that cadmium impacts exceeding the ECOM Table 915-1 allowable level and background level are present at the SEP01-OUTLET@3' location. A verification sample was collected at the SEP01-OUTLET location to confirm the initial results. Verification sample results were within the ECOM Table 915-1 allowable level for cadmium. Final laboratory analytical results for all samples are pending. Once the final laboratory reports have been received, they will be submitted in a subsequent Form 27 Supplemental report. Assessment activities are ongoing.

Proposed Groundwater Sampling

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

Groundwater was not encountered during facility decommissioning activities.

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 November 12, 2024, visual inspections and field screening of soils were conducted at two locations for the AST, three sidewalls of the PWV excavation, one dumphine pothole location, one scrub pot location, two ECD locations, and the meter house. Based on the inspection and screening results, hydrocarbon-impacted soils were not observed at the soil 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.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 9

Number of soil samples exceeding 915-1 5

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) 1.4

NA Highest concentration of SAR

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?

One tank battery background sample (TB-BG01 @0.5') was collected from the soil used to construct the tank battery. Ten background soil samples were also collected as part of the Windell 5-18 wellhead cut and cap activities (Remediation No. 37055), located 1880 ft southeast and from similar NRCS soil type (clayey sand). Background samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ration (SAR), boron, and Table 915-1 metals using ECOMC-approved methods. Analytical results indicate that arsenic, cadmium, and lead are naturally high in the soil used to construct the tank battery and arsenic, barium, cadmium, copper, lead, and selenium are naturally high in the native soil. The background soil sample laboratory analytical results are summarized in Table 2. The background soil sample locations are depicted on Figure 2.

☐ 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 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.

If a suspected release is identified and confirmed through soil screening and/or laboratory analysis, soils will be removed and transported to a licensed disposal facility. Disposal records will be kept on file and available upon request.

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 cadmium impacts exceeding the ECMC Table 915-1 allowable level and background level are present at the SEP01-OUTLET@3' location. A verification sample was collected at the SEP01-OUTLET location to confirm the initial results. Verification sample analytical results were within the ECMC Table 915-1 allowable level for cadmium. Final laboratory analytical results for all samples are pending. Once the final laboratory reports have been received, they will be submitted in a subsequent Form 27 Supplemental report. Groundwater was not encountered during facility decommissioning activities. Assessment activities are ongoing.

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.

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: \$ 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. 07/02/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/12/2024

Proposed site investigation commencement. 11/12/2024

Proposed completion of site investigation. 06/10/2025

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

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: 01/08/2025

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:

Date:

Remediation Project Number: 37543

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**

| | |
|-----------|--------------------------------|
| 404016889 | FORM 27 DENIED |
| 404016992 | PHOTO DOCUMENTATION |
| 404019877 | SOIL SAMPLE LOCATION MAP |
| 404019878 | SOIL SAMPLE LOCATION MAP |
| 404021715 | ANALYTICAL RESULTS |
| 404108787 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 6 Files

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

| | | |
|---------------|---|------------|
| Environmental | ECMC has denied this form. Spill ID 488932 was submitted 12/27/2024 for this location (doc no 404041074) with work proceeding under this remediation project number. Operator shall submit an updated Form 27 Supplemental with a proposed Remediation Plan with implementation schedule for Spill ID 488932. | 02/27/2025 |
|---------------|---|------------|

Total: 1 comment(s)