

State of Colorado
Energy & Carbon Management Commission

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Report taken by:

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	Mobile: ()
Contact Person: Macy Kiel	Email: DJRemediation_Forms@oxy.com		

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36808 Initial Form 27 Document #: 403879656

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: WELL	Facility ID: _____	API #: 123-16686	County Name: WELD
Facility Name: PALOMBO 23-4L	Latitude: 40.216160	Longitude: -104.865040	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 23	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 489394	API #: _____	County Name: WELD
Facility Name: Palombo 23-4L Wellhead	Latitude: 40.216160	Longitude: -104.865040	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 23	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

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

Surface water 860 feet (ft) southwest. Beeman Ditch 1180 ft southwest. An area with wetland characteristics is located approximately 860 ft southwest. Water well 650 ft northwest. Occupied Buildings 640 ft northwest. Livestock 970 ft northeast. County Road 670 ft west. Agriculture. The site is located within ¼ mile of the boundary of a Mule Deer Severe Winter Range High Priority Habitat (HPH) area.

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
Yes	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 Palombo 23-4L wellhead on January 28, 2025. 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. A soil sample [B01(23-4L)@6'] was submitted for analysis of full list ECMC Table 915-1 constituents, to determine if a release occurred. The flowline associated with the wellhead was removed on February 24 and February 25, 2025. Soil samples were collected from the locations where the flowline risers were disconnected from the wellhead [WH01(23-4L)@4'] and from the separator [SEP-RISER(23-4L)@4']. The samples were submitted for analysis of full list Table 915-1 constituents, to determine if a release occurred. Initial analytical results indicated that pH, barium, and lead exceeding the Table 915-1 allowable levels and background levels were present at the former wellhead. Verification samples were collected and confirmed the pH and lead exceedances. As such, a Form 19 Initial/Supplemental Spill/Release report (Document No. 404104501) was submitted on February 27, 2025 and the ECMC issued Spill/Release Point ID 489394. The wellhead excavation and flowline are depicted on Figures 1 and 2. The PID readings and laboratory analytical results are summarized in Tables 1 and 2.

Assessment activities are ongoing and details 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):

Between January 28 and February 25, 2025, soil samples were collected from the base of the cut and cap excavation, [B01(23-4L)@6'] and from the locations where the flowline risers were disconnected from the wellhead [WH01(23-4L)@4'] and from the separator [SEP-RISER(23-4L)@4'] at depths of 4 and 6 ft below ground surface (bgs). The samples were submitted for analysis of full list Table 915-1 constituents using ECMC-approved methods. Initial analytical results indicated that pH, barium, and lead exceeding the Table 915-1 allowable levels and background levels were present at the former wellhead. Verification samples were collected and confirmed the pH and lead exceedances. Assessment activities are ongoing. 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 or flowline removal 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 January 28 and February 24, 2025, visual inspection and field screening of soil were conducted at four sidewall locations within the cut and cap excavation area, four locations at the ground surface adjacent to the cut and cap excavation area, and four 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 ECMC Operator Guidance. A photographic log is attached.

On February 19, 2025, a soil gas survey was conducted at four soil vapor points (SVPs) installed adjacent to the former wellhead following cut and cap activities. One additional SVP was blocked and could not be screened. GEM 5000 readings were non-detect for all remaining SVPs. The SVP locations are depicted on Figure 1. The soil vapor field form is attached.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7

Number of soil samples exceeding 915-1 6

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 24

NA / ND

-- Highest concentration of TPH (mg/kg) 33

-- Highest concentration of SAR 2.58

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

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?

Eight background soil samples (NATIVE-BG01@3' through NATIVE-BG04@3' and NATIVE-BG01@6' through NATIVE-BG04@6') were collected from native material outside of the wellhead excavation areas. Background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and Table 915-1 metals using ECMC-approved methods. Laboratory analytical results indicate that levels of pH, arsenic, and barium are naturally high in the native soil. The background soil sample locations are illustrated on Figure 1. The background soil sample analytical results are summarized in Table 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.

Impacted soil from the wellhead cut and cap excavation will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of assessment activities. Disposal records are kept on file and available upon request. The excavation areas will 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 pH and lead impacts above the ECMC Table 915-1 allowable levels and background levels are present in the cut and cap excavation. Groundwater was not encountered during wellhead cut and cap or flowline removal activities. Assessment activities are ongoing and will be summarized in a subsequent Form 27 Supplemental report.

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.

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. 02/25/2025

Actual Spill or Release date, or date of discovery. 02/24/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/28/2025

Proposed site investigation commencement. 01/28/2025

Proposed completion of site investigation. 12/16/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/28/2025

Proposed date of completion of Remediation. 12/16/2025

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: _____

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: 36808

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**

404242863	ANALYTICAL DATA SUMMARY TABLE(S)
404242865	PHOTO DOCUMENTATION
404242866	OTHER
404242867	LABORATORY ANALYTICAL REPORT
404242868	LABORATORY ANALYTICAL REPORT
404242869	LABORATORY ANALYTICAL REPORT
404242871	LABORATORY ANALYTICAL REPORT
404242872	SOIL SAMPLE LOCATION MAP
404242873	SOIL SAMPLE LOCATION MAP

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)