

State of Colorado  
Energy & Carbon Management Commission

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Receive Date:  
04/16/2025

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 &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Phone: <u>(720) 929-4306</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 #: 25336 Initial Form 27 Document #: 403186801

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>123-10411</u>	County Name: <u>WELD</u>
Facility Name: <u>BERRY 1</u>	Latitude: <u>40.243690</u>	Longitude: <u>-104.908600</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>8</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>483097</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Berry 1 Wellhead</u>	Latitude: <u>40.243690</u>	Longitude: <u>-104.908600</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>8</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 OH Most Sensitive Adjacent Land Use Crop land  
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes  
Is groundwater less than 20 feet below ground surface? No

### Other Potential Receptors within 1/4 mile

Domestic water well: none  
Surface water: located approximately 400' W  
Wetland: an area with wetland characteristics is located approximately 355' SW  
Spring: none  
Livestock: none  
Occupied Building: none  
High Priority Habitats: located within Mule Deer Severe Winter Range

## 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
No	GROUNDWATER	Groundwater not encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	TBD	inspection/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 and flowline removal activities were completed at the Berry 1 wellhead on October 17, 2022 through January 19, 2024. Groundwater was not encountered in the wellhead cut and cap or flowline removal pothole excavation areas. Visual inspection and field screening of soils around the well, associated pumping equipment, and flowline potholes was conducted following wellhead cut and cap operations and flowline removal activities and thirteen soil samples were submitted for laboratory analysis of BTEX, naph, TMBs, TPH, boron, pH, SAR, and EC or Full Table 915-1, as approved in Form 27 Document #403186801 to determine if a release occurred. Laboratory analytical results indicated that soil samples WH-B01@6', WH-S01@5', and WH-W01@5' contained naphthalene, total petroleum hydrocarbons (TPH), 1-methylnaphthalene, benzo(a)anthracene, pH, arsenic, barium, and/or lead concentrations exceeding the applicable ECMC Table 915-1 standards and/or background limits. Additionally, analytical results indicated that the pH concentration in samples FL-B08@4', FL-B10@4', and FL-B21@4' exceeded Table 915-1 standards and background limits. As such, a Form 19-Initial/Supplemental Spill/Release Report (ECMC Document No. 403186801) was submitted on October 19, 2022, and the ECMC issued Spill/Release Point ID 483097. Verification samples (WH-B01-01@6' FL-B08-01@4', FL-B10-01@4', and FL-B21-01@4' were collected and submitted for analysis of As & Pb, or pH only, as applicable. Final analytical results indicate that the As, Pb, and pH concentrations in the verification samples collected were within Table 915-1 standards and/or within background limits. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2-5 The soil sample and field screening locations are illustrated on Figures 1 & 2. The laboratory analytical reports are attached. The field notes and photographic log are provided as Attachment A.

### 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 10/17/22-2/8/24, samples were collected from the wellhead and flowline, and were submitted for analysis of BTEX, naph., TMBs, TPH, pH, EC, SAR, and boron, as approved in Form 27-Initial Document No.403409456, dated 10/5/22. Samples WH-B01@6', WH-S01@5', and WH-W01@5' were submitted for full Table 915-1 based on field observations. Analytical results indicated that multiple soil samples contained naph., TPH, 1-methylnaphthalene, benzo(a)anthracene, pH, arsenic, and/or lead concentrations exceeding the applicable ECMC Table 915-1 standards and background limits. Verification samples (WH-B01-01@6' FL-B08-01@4', FL-B10-01@4', and FL-B21-01@4' were collected and submitted for analysis of As & Pb, or pH only, as applicable. Final analytical results indicate that the As, Pb, and pH concentrations in the verification samples collected were within Table 915-1 standards and/or within background limits. Additional assessment is ongoing to address the remaining exceedances.

#### 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 October 17, 2022, through January 19, 2024, soil screening was conducted at 4 locations at the ground surface adjacent to the wellhead excavation and at 14 flowline removal 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. On October 19, 2022, a soil gas survey was conducted at 5 soil vapor points (SVP-01 - SVP-05) installed adjacent to the former wellhead. GEM 5000 field readings indicated that methane was present, and soil vapor samples were subsequently collected from all 5 SVPs. Results from the gas composition analysis indicated that the detected methane was biogenic, and no further investigation is needed.

## **SITE INVESTIGATION REPORT**

### **SAMPLE SUMMARY**

#### **Soil**

Number of soil samples collected 17

Number of soil samples exceeding 915-1 15

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

Approximate areal extent (square feet) 200

#### **NA / ND**

-- Highest concentration of TPH (mg/kg) 983.0  
8

-- Highest concentration of SAR 3.91

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?

Background soil samples WH-BG01@3'-WH-BG03@3', WH-BG01@6'-WH-BG03@6' were collected from native material adjacent to the wellhead cut and cap excavation. Additional flowline background soil samples FL-BG01@4'-FL-BG05@4' were collected from native material adjacent to the former flowline. The background soil samples were submitted for laboratory analysis of the soil suitability for reclamation parameters and/or ECMC Table 915-1 metals using standard methods appropriate for detecting target analytes in Table 915-1. Analytical results for the background soil samples are presented in Table 3 and 5. Background sample locations are illustrated on Figures 1 and 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?

Site assessment activities to address the remaining soil impacts in multiple soil samples are ongoing and will be summarized in a forthcoming Form 27-Supplemental update.

# 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.

Site assessment activities to address the remaining soil impacts in multiple soil samples are ongoing and will be summarized in a forthcoming Form 27-Supplemental update.

## 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.

Site assessment activities to address the remaining soil impacts in multiple soil samples are ongoing and will be summarized in a forthcoming Form 27-Supplemental update.

## 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.

# 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 Colorado Oil and Gas Conservation Commission. The cost for remediation is a preliminary estimate only, costs may change upwards or downwards 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: \$ 15500 \_\_\_\_\_

## 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. 08/11/2022

Actual Spill or Release date, or date of discovery. 10/18/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/17/2022

Proposed site investigation commencement. 10/17/2022

Proposed completion of site investigation. 06/30/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/18/2022

Proposed date of completion of Remediation. 06/30/2025

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**

In response to the comment on the previously denied Form 27-Supplemental NFA Request (Document #403922768, denied on 11/14/24), the organic verification samples have been removed from the applicable data. As such, assessment activities are ongoing and will be summarized in a forthcoming Form 27-Supplemental update.

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: 04/16/2025

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: Grace Rollins

Date: 07/24/2025

Remediation Project Number: 25336

**COA Type****Description**

	The horizontal and vertical extent of impacts to soil have not been delineated to date. In the event that the extents of the excavation(s) encroach on or approach close proximity to the current background samples, those background samples shall be omitted from future background determination calculations.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
2 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**

404092543	FORM 27-SUPPLEMENTAL-SUBMITTED
404093382	PHOTO DOCUMENTATION
404093412	ANALYTICAL DATA SUMMARY TABLE(S)
404096182	LABORATORY ANALYTICAL REPORT
404096183	LABORATORY ANALYTICAL REPORT
404096185	LABORATORY ANALYTICAL REPORT
404166965	SOIL SAMPLE LOCATION MAP
404166968	SOIL SAMPLE LOCATION MAP

Total Attach: 8 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)