

State of Colorado
Energy & Carbon Management Commission

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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: KERR MCGEE OIL & GAS ONSHORE LP	Operator No: 47120	Phone Numbers
Address: P O BOX 173779		
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Erik Mickelson	Email: DJRemediation_Forms@oxy.com	
		Phone: (720) 929-4307
		Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35208 Initial Form 27 Document #: 403753714

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 #: 123-22070 County Name: WELD

Facility Name: BOYLE STATE 8-16 Latitude: 40.139940 Longitude: -104.775130

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: SENE Sec: 16 Twp: 2N Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 487611 API #: _____ County Name: WELD

Facility Name: Boyle St 8-16 Wellhead Latitude: 40.139940 Longitude: -104.775130

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: SENE Sec: 16 Twp: 2N Range: 66W 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

Pond 1,000 feet (ft) northwest. Fulton Ditch 470 ft northwest. Water well 940 ft west. Occupied buildings 1,120 ft southwest and 1,270 ft north. Livestock 900 ft northwest. County Road 640 ft east. Agriculture. An area with wetland characteristics is located approximately 1,020 ft northwest of the wellhead. Groundwater at approximately 4 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
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 & cap operations were completed at the Boyle St 8-16 wellhead on 7/10/2024. Groundwater was encountered at a depth of 4 ft bgs. Visual inspection & field screening of soils around the wellhead & associated pumping equipment was conducted following cut & cap operations, & a soil sample (B01@6') was submitted for analysis of full list ECMC Table 915-1 constituents, to determine if a release occurred. A portion of the flowline associated with the wellhead was partially removed between 7/8 & 7/15/2024. Samples were collected from the locations where the flowline risers were disconnected from the wellhead (WH01-RISER@3') & from the separator (SEP01-RISER@4') & from one flowline pothole where the flowline was cut & capped (FL01@4). Per the conditions of approval (COA) issued by the ECMC for Doc# 403753714. On 3/5/2025, one sample was collected along the abandoned in place flowline where it turns from NW to WSW [FL02(8-16)@4']. Samples were submitted for full list Table 915-1 constituents to determine if a release occurred. The status of the remaining flowline has been changed to out-of-service due to an active irrigation ditch. Additional assessment cannot be safely completed at this time. When the remaining flowline removal activities are scheduled, a new Form 27 Initial will be submitted. Laboratory analytical results indicated that naphthalene, 1-methylnaphthalene, sodium adsorption ratio (SAR), & pH impacts exceeding the Table 915-1 allowable levels & background levels were present at the B01@6 location. As such, a Form 19 Initial/Supplemental Spill/Release Report (Doc# 403880796) was submitted on 8/7/2024 & the ECMC issued Spill/Release Point ID 487611. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively. The wellhead and flowline are depicted on Figures 1 & 2. The lab report is attached.

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 7/10 and 9/12/2024, excavation activities were conducted to address remaining soil impacts at the wellhead excavation and seven confirmation soil samples were collected from the base and sidewalls of the final excavation extents at depths of approximately 9 ft bgs and 5 ft bgs, respectively. The confirmation soil samples were submitted for analysis of polycyclic aromatic hydrocarbons (PAH), SAR, pH, boron, and select Table 915-1 metals using ECMC-approved methods. Results indicate that pH exceeding the Table 915-1 allowable level and background level is present at the E01@5' location.

Proposed Groundwater Sampling

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

On 7/8/2024 and 7/15/2024, two groundwater samples (GW-SEP02-OUTLET@4, GW-FL01@4') were collected from the separator outlet and the flowline pothole at a depth of 4 ft bgs. Groundwater was not in contact with impacted soil. The groundwater samples were submitted for analysis of Table 915-1 organic constituents in groundwater. Based on the laboratory analytical results groundwater concentrations were in compliance with ECMC Table 915-1 allowable levels for all requested analytes. No organic constituents were detected above the laboratory reporting limits. The groundwater sample analytical results are summarized in Table 3.

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):

Between 7/10/2024 and 7/15/2024, 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 ten 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 7/25/2024, a soil gas survey was conducted at five 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

Number of soil samples collected 11

Number of soil samples exceeding 915-1 11

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

Approximate areal extent (square feet) 57

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 31.7

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 9

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 4

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

NA 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?

Twelve background soil samples (NATIVE-B01@3' through NATIVE-BG06@3' and NATIVE-BG01@6' through NATIVE-BG06@6') were collected from the native material outside of the wellhead excavation areas. Background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), SAR, boron and Table 915-1 metals using ECMC-approved methods. Analytical results indicate that EC, SAR, pH, boron, arsenic, barium, cadmium, hexavalent chromium, lead, nickel, and selenium are naturally high in the native soil. The background soil sample analytical results are summarized in Table 2. The background soil sample locations are illustrated on Figure 3.

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?

Due to changes in ECMC guidance, additional sample volume will be collected at the confirmation soil sample locations within the wellhead excavation. The samples will be analyzed for total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), 1,2,4- and 1,2,3-trimethylbenzene (TMBs), and EC to complete full list Table 915-1 constituents.

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.

Approximately 160 cubic yards of impacted soil were removed from the site and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Disposal records are kept on file and are available upon request. The excavation area has been 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 exceeding the ECMC Table 915-1 allowable level and background level remain in the wellhead excavation. Groundwater was encountered at approximately 4 ft bgs. Analytical results indicate that groundwater concentrations were in compliance with ECMC Table 915-1 allowable levels for all requested analytes. Due to changes in ECMC guidance, additional sample volume will be collected at the confirmation soil sample locations within the wellhead excavation. The samples will be analyzed for TPH, BTEX, TMBs, and EC to complete full list Table 915-1 constituents.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 160

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

No _____ 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.

REMEDATION 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: \$ 0 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

N/A

Volume of E&P Waste (solid) in cubic yards _____ 160

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Buffalo Ridge Landfill - Keenesburg, Colorado

Volume of E&P Waste (liquid) in barrels _____ 0

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION 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. 08/08/2024

Actual Spill or Release date, or date of discovery. 08/07/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/08/2024

Proposed site investigation commencement. 07/08/2024

Proposed completion of site investigation. 06/09/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/08/2024

Proposed date of completion of Remediation. 06/09/2026

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

Due to changes in ECMC guidance, additional sample volume will be collected at the confirmation soil sample locations within the wellhead excavation. The samples will be analyzed for TPH, BTEX, TMBs, and EC to complete full list Table 915-1 constituents.

All verification sample results have been omitted from the summary table and figures due to updated ECMC instructions. All verification sample results are included in the previously submitted laboratory analytical reports.

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 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: 35208 _____

COA Type**Description**

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**

404538636	SOIL SAMPLE LOCATION MAP
404538639	SOIL SAMPLE LOCATION MAP
404580530	LABORATORY ANALYTICAL REPORT
404580559	PHOTO DOCUMENTATION
404580561	LABORATORY ANALYTICAL REPORT
404582010	SOIL SAMPLE LOCATION MAP
404582232	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 7 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)