



Kerr-McGee Oil & Gas Onshore LP  
1099 18<sup>th</sup> Street, Suite 1800  
Denver, Colorado 80202  
720-929-6000 Fax 720-929-7000

July 5, 2016

Mr. Erik Mickelson  
Senior HSE Representative  
Kerr-McGee Oil & Gas Onshore LP  
1099 18th Street, Suite 1800  
Denver, Colorado 80202

**Re: Sump Replacement Summary Letter Report  
Paragon 10N-31HZ  
API: 05-123-38548 and -38549  
Facility ID: 435265  
SESE Sec 6-T1N-R65W  
COGCC Remediation #8961**

Dear Mr. Mickelson:

Apex Companies, LLC (Apex) is providing Kerr-McGee Oil & Gas Onshore LP (Kerr-McGee) with this Sump Replacement Summary Letter Report (Report) to document sampling activities and the results of environmental testing at the above-referenced site. This Report is being submitted under the Form 27 Management Plan for Closure of Produced Water Vessels, which has been assigned Remediation #8961 by the COGCC. Apex provided the environmental services at the site that included collection of confirmation soil samples from the excavation and documentation of field activities, as described below.

#### **Site Assessment Activities**

The field activities described herein were performed on July 1, 2016, with the purpose of assessing potential hydrocarbon impacts at the site related to the replacement of the produced water sump. Soil sampling activities, laboratory analytical results, and conclusions are presented below. The general site layout and sample locations are provided on Figure 1.

The final extent of the excavation measured approximately 20 feet by 20 feet with an approximate depth of 4.5 feet below ground surface (bgs). No impacted soils were encountered in the excavation during closure activities. A liner was present below the tanks, and groundwater was not encountered in the excavation.

Confirmation soil samples were collected from the sidewalls of the excavation area at approximately 3 feet bgs. Soil samples were field screened for volatile organic compound (VOC) concentrations using a photoionization detector (PID). The confirmation soil sample collected from the north sidewall (North 1 @ 3') of the excavation area was submitted to Origins Laboratory in Denver, Colorado, for analysis of

benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbons (TPH) – gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) Method 8260, and TPH – diesel range and residual range organics (DRO and RRO) by USEPA Method 8015, electrical conductivity (EC), and pH. Soil analytical data is summarized in Table 1 and the laboratory analytical report is provided in Attachment A.

## Results

Soil analytical results from soil sample North 1 @ 3' indicated that BTEX and TPH concentrations were below the applicable COGCC Table 910-1 standards. The remaining three soil samples collected from the sidewalls of the excavation area were not submitted for laboratory analysis as analytical data confirmed the absence of petroleum hydrocarbon impacts above regulatory standards.

## Conclusions

Analytical results described herein confirm BTEX and TPH impacts are not present at concentrations above applicable regulatory standards in the former sump location. Consequently, no further site assessment or remedial activity is necessary. Following site assessment activities, the produced water sump was replaced.

Please contact me at (303)242-8671 if you have any questions regarding this report or require additional information.

Sincerely,

Apex Companies, LLC

A handwritten signature in blue ink, reading "Jacob H. Hildebrand".

Jacob Hildebrand, PMP  
Project Manager

## Attachments:

Table 1 – Soil Sample Results Summary Table  
Figure 1 – Site Map  
Attachment A – Laboratory Analytical Reports

# Table 1 - Soil Sample Analytical Results



Kerr-McGee Oil & Gas Onshore LP

Location Name: Paragon 10N-31HZ

Location ID: 435265

API #: 05-123-38548 and -38549

County: Weld

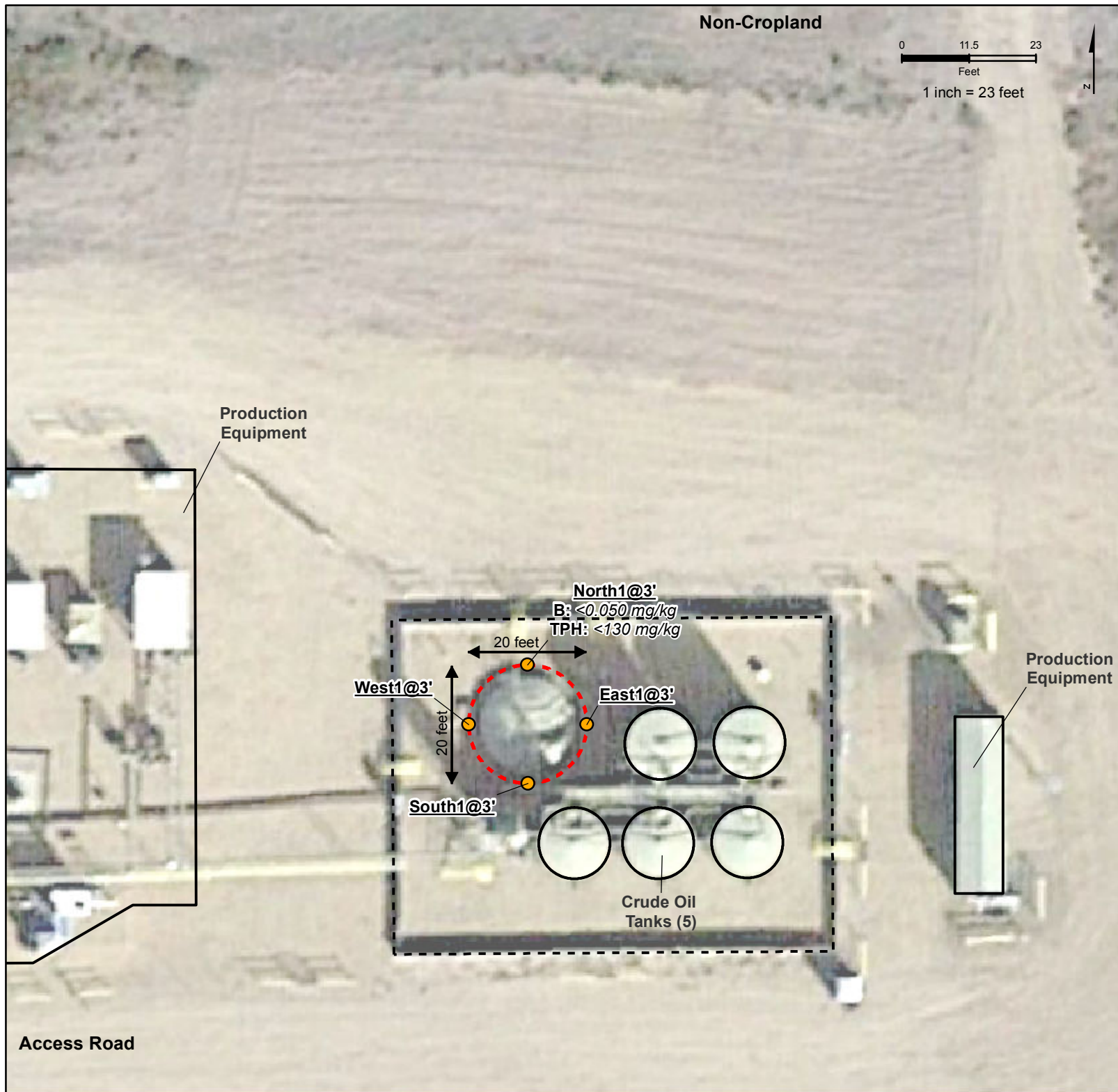
COGCC Allowable Concentration →			Organics in Soil							Inorganics in Soil	
			500			0.17	85	100	175	(<4 or 2x background)	(6-9)
Sample ID	Sample Date	Depth (feet bgs)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	TPH-RRO (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes - total (mg/kg)	Electrical Conductivity (mmhos/cm)	pH
North 1 @ 3'	07/01/16	3'	<5.00	<25.0	<100	<0.050	<0.050	<0.050	<0.050	0.116	8.09

**Notes:**

TPH Total petroleum hydrocarbons  
 GRO Gasoline range hydrocarbons (C6 - C10)  
 DRO Diesel range organics (C10 - C28)  
 RRO Residual range organics (C28 - C36)





**Bold** cell indicates result exceeded COGCC Table 910-1 allowable concentration for the contaminant / inorganic of concern

bgs below ground surface  
 mg/kg milligrams per kilogram  
 mmhos/cm millimhos per centimeter  
 NA Not analyzed / not available  
 COGCC Colorado Oil and Gas Conservation Commission



**Figure 1**  
**Paragon 10N-31HZ**  
**Site Layout**

**Legend**

-  Soil Sample
-  Excavation Extent
-  Existing Equipment
-  Secondary Containment

**Sample Location**

B: benzene  
TPH: total petroleum hydrocarbons

Bold values exceed COGCC Table  
910-1 allowable concentrations

**Site Characteristics**

**Legal Location:** SESE, Sec 6, T1N R65W  
**County:** Weld  
**Land Use:** Non-Cropland  
**Topography:** 0-3%  
**Run-Off Risk:** Very low  
**Soil Type:** Vona loamy sand

REVISED	BY	COMMENT
7/5/2016	BJB	Figure 1



Apex Companies, LLC  
beau.bergstrom@apexcos.com  
M:\Projects\Anadarko\DJ\_Basin\Remediation\Paragon\_10N-31HZ\Projects\Paragon\_10N-31HZ\_Fig1.dwg 20160705.mxd

**Attachment A**

**Laboratory Analytical Report**



July 05, 2016

Apex Companies, LLC

Jake Hildebrand

4150 Darley Avenue, Suite 1

Boulder CO 80305

Project Name - KMG - Paragon 10N-31Hz

Project Number - [none]

Attached are your analytical results for KMG - Paragon 10N-31Hz received by Origins Laboratory, Inc. July 01, 2016. This project is associated with Origins project number X607019-01.

The analytical results in the following report were analyzed under the guidelines of EPA Methods. These methods are identified as follows; "SW" are defined in SW-846, "EPA" are defined in 40CFR part 136 and "SM" are defined in the most current revision of Standard Methods For the Examination of Water and Wastewater.

The analytical results apply specifically to the samples and analyses specified per the attached Chain of Custody. As such, this report shall not be reproduced except in full, without the written approval of Origin's laboratory.

Unless otherwise noted, the analytical results for all soil samples are reported on a wet weight basis. All analytical analyses were performed under NELAP guidelines unless noted by a data qualifier.

Any holding time exceedances, deviations from the method specifications or deviations from Origins Laboratory's Standard Operating Procedures are outlined in the case narrative.

Thank you for selecting Origins for your analytical needs. Please contact us with any questions concerning this report, or if we can help with anything at all.

Origins Laboratory, Inc.  
303.433.1322  
o-squad@oelabinc.com



1725 Elk Place, Denver, CO 80211 | Phone: 303.433.1322 | Fax: 303.265.9645

Apex Companies, LLC

4150 Darley Avenue, Suite 1

Boulder CO 80305

Jake Hildebrand

Project Number: [none]

Project: KMG - Paragon 10N-31Hz

## CROSS REFERENCE REPORT

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
North 1 @ 3'	X607019-01	Soil	July 1, 2016 11:50	07/01/2016 14:40

Origins Laboratory, Inc.



*The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.*



Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

# ORIGINS

LABORATORY, INC

Client: Apex Companies  
 Address: 1761 Cole Blvd  
Lakewood, CO 80401  
 Telephone Number: 970-903-1260  
 Email Address: Jake.Hildebrand@apexcos.com  
Chris.Hines@apexcos.com

Project Manager: Jacob Hildebrand  
 Project Name: Paragon 10N-31H2  
 Project Number: Erik Mickelson  
 Samples Collected By: Skyler Bruno

\* Please bill to Anadarko

Sample ID Description	Date Sampled	Time Sampled	# of Containers	Preservative				Matrix			Analysis				Sample Instructions	
				Unpreserved	HCl	HNO <sub>3</sub>	Other	Groundwater	Soil	As Summa #	Other	GbTEX	DrO/Oro	PH		EC
North 1 @ 3'	7/1/16	1150	2	X				X				X	X	X	Hold SAR	1
West 1 @ 3'	7/1/16	1151	2	X				X							Hold	2
South 1 @ 3'	7/1/16	1153	2	X				X							Hold	3
East 1 @ 3'	7/1/16	1154	2	X				X							Hold	4
Background	7/1/16	1205	2	X				X							Hold	5
Groundwater 1 @ 45'	7/1/16	1221	3	X				X							Hold	6
																7
																8
																9
																10
Relinquished By: <u>SM pro</u>	Date: <u>7/1/16</u>	Time: <u>1440</u>	Received By:			Date:	Time:	Turnaround Time: Same Day <input checked="" type="checkbox"/> 24 Hr <input type="checkbox"/> 48 Hr <input type="checkbox"/> 72 Hr <input type="checkbox"/> Standard <input type="checkbox"/>								
Relinquished By:	Date:	Time:	Received By: <u>SM</u>			Date: <u>7/1/16</u>	Time: <u>1440</u>									

Temp Received: 7/3/16

Date Results Needed

7/5/16 7AM

Origins Laboratory, Inc.

Jose Pellegrini

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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

Origins Laboratory

F-012207-01-R1  
Effective Date: 01/09/12

## Sample Receipt Checklist

Origins Work Order: X607019

Client: Apex

Client Project ID: Paragon 10N-31Hz

Checklist Completed by: Jefe Smith

Shipped Via: 4/AD

Date/time completed: 7/1/12

(UPS, FedEx, Hand Delivered, Pick-up, etc.)

Airbill #: NA

Matrix(s) Received: (Check all that apply): ☒ Soil/Solid ☒ Water ☐ Other: \_\_\_\_\_

Cooler Number/Temperature: 1 / 23.1 °C 1 °C 1 °C (Describe) 1 °C

Thermometer ID: T003

Requirement Description	Yes	No	N/A	Comments (if any)
If samples require cooling, was the temperature between 0°C to ≤ 6°C <sup>(1)</sup> ?		<input checked="" type="checkbox"/>		<u>Sampled Same Day</u>
Is there ice present (document if blue ice is used)	<u>7/1/12</u> <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Are custody seals present on cooler? (if so, document in comments if they are signed and dated, broken or intact)		<input checked="" type="checkbox"/>		
Are custody seals present on each sample container? (if so, document in comments if they are signed and dated, broken or intact)		<input checked="" type="checkbox"/>		
Were all samples received intact <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			
Was adequate sample volume provided <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			
Are short holding time analytes or samples with HTs due within 48 hours present <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			
Is a chain-of-custody (COC) present and filled out completely <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			<u>PH</u>
Does the COC agree with the number and type of sample bottles received <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			
Do the sample IDs on the bottle labels match the COC <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			
Is the COC properly relinquished by the client with date and time recorded <sup>(1)</sup> ?	<input checked="" type="checkbox"/>			
For volatiles in water – is there headspace (> ¼ inch bubble) present? If yes, contact client and note in narrative.		<input checked="" type="checkbox"/>		
Are samples preserved that require preservation and was it checked <sup>(1)</sup> ? (note ID of confirmation instrument used in comments) / (preservation is not confirmed for subcontracted analyses in order to insure sample integrity) / (pH < 2 for samples preserved with HNO <sub>3</sub> , HCL, H <sub>2</sub> SO <sub>4</sub> ) / (pH > 10 for samples preserved with NaAsO <sub>2</sub> +NaOH, ZnAc+NaOH)		<input checked="" type="checkbox"/>		
Additional Comments (if any):				

<sup>(1)</sup>If NO, then contact the client before proceeding with analysis and note date/time and person contacted as well as the corrective action to in the additional comments (above) and the case narrative.

Reviewed by (Project Manager) Jefe Smith

Date/Time Reviewed 7/1/12

Origins Laboratory, Inc.

*Jefe Pellegrini*

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

North 1 @ 3'  
7/1/2016 11:50:00AM

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Notes
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**Origins Laboratory, Inc.**  
**X607019-01 (Soil)**

**DRO/RRO by EPA8015C**

Diesel (C10-C28)	ND	25.0	mg/kg	1	B6G0102	07/01/2016	07/01/2016	U
Residual Range Organics (C28-C40)	ND	100	"	"	"	"	"	U

Surrogate: o-Terphenyl 66.6 % 59-131 " " "

**GBTEX by EPA 8260C**

Gasoline Range Hydrocarbons	ND	5.00	mg/kg	25	B6G0101	07/01/2016	07/01/2016	U
Benzene	ND	0.050	"	"	"	"	"	U
Toluene	ND	0.050	"	"	"	"	"	U
Ethylbenzene	ND	0.050	"	"	"	"	"	U
Xylenes, total	ND	0.050	"	"	"	"	"	U

Surrogate: 1,2-Dichloroethane-d4 88.2 % 70-130 " " "  
Surrogate: Toluene-d8 98.0 % 70-130 " " "  
Surrogate: 4-Bromofluorobenzene 106 % 70-130 " " "

**pH in Soil by EPA 9045D**

pH	8.09		pH Units	1	B6G0106	07/01/2016	07/01/2016	
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**Specific Conductance by Modified 9050A**

Specific Conductance (EC)	0.116		mmhos/cm	"	B6G0107	07/01/2016	"	
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Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

**Volatile Organic Compounds by GC/MS SW846 8260C - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch B6G0101 - EPA 5030 (soil)</b>										
<b>Blank (B6G0101-BLK1)</b>					Prepared: 07/01/2016 Analyzed: 07/01/2016					
Gasoline Range Hydrocarbons	ND	0.200	mg/kg							U
Benzene	ND	0.002	"							U
Toluene	ND	0.002	"							U
Ethylbenzene	ND	0.002	"							U
Xylenes, total	ND	0.002	"							U
Surrogate: 1,2-Dichloroethane-d4	55		ug/kg	62.5		87.5	70-130			
Surrogate: Toluene-d8	59		"	62.5		95.0	70-130			
Surrogate: 4-Bromofluorobenzene	67		"	62.5		108	70-130			

Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

**Volatile Organic Compounds by GC/MS SW846 8260C - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch B6G0101 - EPA 5030 (soil)</b>										
<b>LCS (B6G0101-BS1)</b>					Prepared: 07/01/2016 Analyzed: 07/01/2016					
Benzene	0.101	0.002	mg/kg	0.100		101	77.1-124			
Toluene	0.085	0.002	"	0.100		85.1	74.5-128			
Ethylbenzene	0.095	0.002	"	0.100		95.3	66.4-127			
m,p-Xylene	0.182	0.004	"	0.200		90.8	76.6-124			
o-Xylene	0.083	0.002	"	0.100		82.5	76.6-124			
Surrogate: 1,2-Dichloroethane-d4	53		ug/kg	62.5		85.1	70-130			
Surrogate: Toluene-d8	62		"	62.5		98.5	70-130			
Surrogate: 4-Bromofluorobenzene	66		"	62.5		105	70-130			

Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

**Volatile Organic Compounds by GC/MS SW846 8260C - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch B6G0101 - EPA 5030 (soil)**

Matrix Spike (B6G0101-MS1)		Source: X607001-02			Prepared: 07/01/2016 Analyzed: 07/01/2016					
Benzene	0.103	0.002	mg/kg	0.100	0.004	98.3	71.8-126			
Toluene	0.092	0.002	"	0.100	0.004	87.8	65.1-130			
Ethylbenzene	0.114	0.002	"	0.100	ND	114	62.2-130			
m,p-Xylene	0.220	0.004	"	0.200	ND	110	46.5-137			
o-Xylene	0.094	0.002	"	0.100	0.0005	93.0	54.2-134			
Surrogate: 1,2-Dichloroethane-d4	53		ug/kg	62.5		84.6	70-130			
Surrogate: Toluene-d8	61		"	62.5		98.0	70-130			
Surrogate: 4-Bromofluorobenzene	65		"	62.5		105	70-130			

Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

**Volatile Organic Compounds by GC/MS SW846 8260C - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch B6G0101 - EPA 5030 (soil)**

Matrix Spike Dup (B6G0101-MSD1)		Source: X607001-02			Prepared: 07/01/2016 Analyzed: 07/01/2016					
Benzene	0.100	0.002	mg/kg	0.100	0.004	95.3	71.8-126	2.97	11.3	
Toluene	0.091	0.002	"	0.100	0.004	86.7	65.1-130	1.16	15.4	
Ethylbenzene	0.107	0.002	"	0.100	ND	107	62.2-130	5.86	19.6	
m,p-Xylene	0.208	0.004	"	0.200	ND	104	46.5-137	5.45	19.2	
o-Xylene	0.090	0.002	"	0.100	0.0005	89.7	54.2-134	3.61	17.9	
Surrogate: 1,2-Dichloroethane-d4	55		ug/kg	62.5		88.1	70-130			
Surrogate: Toluene-d8	65		"	62.5		103	70-130			
Surrogate: 4-Bromofluorobenzene	66		"	62.5		106	70-130			

Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

**Volatile Organic Compounds by GC/MS SW846 8260C - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Extractable Petroleum Hydrocarbons by 8015C - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch B6G0102 - EPA 3580**

**Blank (B6G0102-BLK1)**

Prepared: 07/01/2016 Analyzed: 07/01/2016

Diesel (C10-C28)	ND	50.0	mg/kg							U
Residual Range Organics (C28-C40)	ND	200	"							U
Surrogate: o-Terphenyl	49		"	50.0		97.5	59-131			

**LCS (B6G0102-BS1)**

Prepared: 07/01/2016 Analyzed: 07/01/2016

Diesel (C10-C28)	1020	50.0	mg/kg	1000		102	64-121			
Residual Range Organics (C28-C40)	1200	200	"	1000		120	58-124			
Surrogate: o-Terphenyl	48		"	50.0		95.9	59-131			

**Matrix Spike (B6G0102-MS1)**

**Source: X607001-02**

Prepared: 07/01/2016 Analyzed: 07/01/2016

Diesel (C10-C28)	1000	50.0	mg/kg	1000	ND	100	53-125			
Residual Range Organics (C28-C40)	1100	200	"	1000	32.2	107	47-133			
Surrogate: o-Terphenyl	54		"	50.0		108	59-131			

**Matrix Spike Dup (B6G0102-MSD1)**

**Source: X607001-02**

Prepared: 07/01/2016 Analyzed: 07/01/2016

Diesel (C10-C28)	862	50.0	mg/kg	1000	ND	86.2	53-125	15.0	20	
Residual Range Organics (C28-C40)	942	200	"	1000	32.2	90.9	47-133	16.5	20	
Surrogate: o-Terphenyl	48		"	50.0		95.8	59-131			

Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

## Classical Chemistry Parameters - Quality Control Origins Laboratory, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch B6G0106 - NO PREP</b>										
<b>Duplicate (B6G0106-DUP1)</b>		<b>Source: X607019-01</b>			Prepared: 07/01/2016 Analyzed: 07/01/2016					
pH	8.02		pH Units		8.09			0.869	25	
<b>Batch B6G0107 - NO PREP</b>										
<b>Blank (B6G0107-BLK1)</b>		Prepared: 07/01/2016 Analyzed: 07/01/2016								
Specific Conductance (EC)	0.00340		mmhos/cm							
<b>Duplicate (B6G0107-DUP1)</b>		<b>Source: X607019-01</b>			Prepared: 07/01/2016 Analyzed: 07/01/2016					
Specific Conductance (EC)	0.113		mmhos/cm		0.116			2.01	25	

Origins Laboratory, Inc.



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Apex Companies, LLC  
4150 Darley Avenue, Suite 1  
Boulder CO 80305

Jake Hildebrand  
Project Number: [none]  
Project: KMG - Paragon 10N-31Hz

### Notes and Definitions

U Sample is Non-Detect.

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

All soil results are reported at a wet weight basis.

Origins Laboratory, Inc.



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Jen Pellegrini For Noelle Doyle Mathis, President