

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
Candice (Nikki) Graber

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 COGCC 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 & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers Phone: <u>(970) 515-1698</u> Mobile: <u>()</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		
Contact Person: <u>Greg Hamilton</u> Email: <u>Gregory_Hamilton@oxy.com</u>		

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 17400 Initial Form 27 Document #: 402638226

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: Wellhead P&A and Flowline Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-16598</u>	County Name: <u>WELD</u>
Facility Name: <u>HSR-SCHMID 2-34</u>	Latitude: <u>40.273692</u>	Longitude: <u>-104.760928</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>34</u>	Twp: <u>4N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agriculture
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? Yes

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	Assessment Ongoing	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	Assessment Ongoing	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.

During plugging and abandonment activities at the Schmid 2-34 wellhead, historically impacted soil and groundwater were discovered. The volume of the release is unknown. Assessment activities are ongoing. Excavation activities will be paused temporarily due to landowner request and site conditions caused by farming activities. Excavation activities will resume once harvest has been completed. The assessment details will be summarized in a supplemental report. The topographic Site Location Map showing the geographic setting of the site is provided as Figure 1.

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):

Flowline and wellhead excavation soil screening and sampling began on April 20, 2021. Soil samples are being collected from the wellhead excavations and the flowline potholes and field screened for total volatile organic compounds using a photoionization detector (PID). Soil samples with elevated PID readings are submitted for laboratory analysis. To-date, only wellhead excavation base soil sample B04@15' exceeds for arsenic and flowline excavation western sidewall sample Pothole-W03@5' exceeds for sodium adsorption ratio. Excavation activities are ongoing. The soil sample results and PID readings collected to-date are summarized in Table 1 and Table 2, respectively. The laboratory analytical reports are attached.

Proposed Groundwater Sampling

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

On April 22, 2021, one groundwater sample was collected from the wellhead excavation for the full list Table 915-1 analyses. One background groundwater sample (BG-GW01) was also collected to assess the natural levels for inorganic analyses. Laboratory analytical results indicated groundwater sample GW01 exceeds the COGCC Table 915-1 allowable levels for Chloride Ion and Sulfate Ion. The groundwater sample analytical results are summarized in Table 3, and the laboratory analytical reports are attached.

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):

Following cut and cap operations, a soil gas survey was conducted. Five soil vapor points (SVP01 through SVP05) were installed adjacent to the former wellhead location. Field screening was conducted using a GEM 5000 gas meter. No methane was detected adjacent to the wellhead, and the soil vapor points were subsequently abandoned. The soil vapor point field measurements are summarized in the attached field form.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 24

Number of soil samples exceeding 915-1 21

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) 490.7

-- Highest concentration of SAR 8.61

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 9'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

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?

Three background soil samples (BG01@6', BG02@9', and Native-BG03@12') were collected for laboratory analysis of EC, SAR, pH, boron, and metals. One background groundwater sample (Pothole01-GW01) was also collected to assess the natural levels for inorganic analyses.

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. Excavation activities will be paused temporarily due to landowner request and site conditions caused by farming activities. Excavation activities will resume once harvest has been completed.

Following completion of excavation activities, groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of the residual dissolved-phase groundwater impact.

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.

Excavation activities are ongoing. Impacted soil 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.

Remedial options will be assessed following completion of assessment activities.

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 COGCC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
No _____ 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.

Groundwater monitoring wells will be installed at the site to fully define the extent and magnitude of the residual dissolved-phase groundwater impact. The monitoring wells will be surveyed to determine the groundwater flow direction. Groundwater monitoring activities will be conducted on a quarterly schedule and samples will be submitted for full list Table 915-1 analyses.

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 _____

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 _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

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

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC 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? No _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? No _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the COGCC 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 COGCC 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. 11/18/2020

Actual Spill or Release date, or date of discovery. 04/27/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/20/2021

Proposed site investigation commencement. 04/20/2021

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/20/2021

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

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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: ` Greg Hamilton _____

Title: Environmental Consultant _____

Submit Date: ` 08/05/2021 _____

Email: Gregory_Hamilton@oxy.com _____

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: Candice (Nikki) Graber _____

Date: 08/25/2021 _____

Remediation Project Number: 17400 _____

Condition of Approval**COA Type****Description**

	Operator shall notify COGCC EPS personnel no less than 72 hours prior to initiating additional source removal or installation of monitoring wells.
1 COA	

Attachment Check 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**

402766766	FORM 27-SUPPLEMENTAL-SUBMITTED
402766811	MAP
402766919	LOGS
402771729	ANALYTICAL RESULTS

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)