

State of Colorado Oil and Gas Conservation Commission

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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 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
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 336-3500</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Gregory Hamilton</u>	Email: <u>Gregory_Hamilton@oxy.com</u>	Mobile: <u>(970) 515-1698</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25182 Initial Form 27 Document #: 403170022

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>123-21632</u>	County Name: <u>WELD</u>
Facility Name: <u>PSC 15-11</u>	Latitude: <u>40.233850</u>	Longitude: <u>-104.856676</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>11</u>	Twp: <u>3N</u>	Range: <u>67W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		
Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-24048</u>	County Name: <u>WELD</u>
Facility Name: <u>PSC 37-11</u>	Latitude: <u>40.233751</u>	Longitude: <u>-104.856527</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>11</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>483687</u>	API #: _____	County Name: <u>WELD</u>	
Facility Name: <u>PSC 15-11 Flowline Historical Rel.</u>		Latitude: <u>40.234207</u>		Longitude: <u>-104.855326</u>	
** correct Lat/Long if needed: Latitude: _____ Longitude: _____					
QtrQtr: <u>SWSE</u>	Sec: <u>11</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 SC Most Sensitive Adjacent Land Use Crop land

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

The nearest domestic water well is located approximately 300 feet northeast of the wellheads.
 Surface water is located approximately 375 feet south of the wellheads.
 A wetland is located approximately 280 feet northeast of the wellheads.
 The wellheads are located within a designated high-priority habitat.

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
No	GROUNDWATER	No impacts encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	To be determined	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 were completed at the PSC 15-11 and PSC 37-11 wellheads on December 2 and 21, 2022, respectively. Groundwater was encountered in the wellhead excavation areas at approximately 3 to 6 feet below ground surface (bgs). Visual inspection and field screening of soils around the wells and associated pumping equipment was conducted following cut and cap operations, and soil samples were submitted for laboratory analysis to determine if a release occurred. The flowlines associated with these wellheads were removed on December 2, 2022 through January 6, 2023 and soil samples were collected from the locations where the flowline risers were disconnected at the wellheads and separator, where the flowlines changed direction or crossed, and where groundwater and/or potential soil impacts were encountered, and submitted for laboratory analysis to determine if a release occurred. Based on field observations, soil samples 15-11-FL-B07@4' and 15-11-FL-B09@4' were selected for waste characterization purposes and analyzed for the full COGCC Table 915-1 analytical suite using standard COGCC-approved methods. Laboratory analytical results for the waste characterization samples indicated that soil impacts were present due to TMB, PAHs, and barium (Ba) concentrations above COGCC standards. As such, a Form 19-Initial/Supplemental Spill/Release Report (Document No. 403282235) was submitted on January 6, 2023, and the COGCC issued Spill/Release Point ID 483687. Analytical results indicated that the remaining constituent concentrations in the soil samples collected during wellhead cut and cap and flowline removal activities were in compliance with COGCC standards and/or within the range of site-specific background levels. A topographic site location map is provided as Figure 1. Soil sample location and field screening data are presented in Table 1. The soil and groundwater sample and field screening locations are illustrated on Figures 2 through 4.

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 December 2, 2022 through January 6, 2023, soil samples were collected from the cut and cap excavation areas and from 11 locations along the former flowlines. The soil samples were submitted for laboratory analysis of BTEX, TMB, naphthalene, TPH-GRO (C6-C10), DRO (C10-C28), ORO (C28-C40), pH, EC, SAR, boron, and/or PAHs and metals, using standard COGCC-approved methods. Analytical results indicated that soil impacts were present at flowline sample locations 15-11-FL-B07@4' and 15-11-FL-B09@4' due to TMB, PAHs, and Ba. The remaining constituent concentrations in the soil samples collected during cut and cap and flowline removal activities were in compliance with COGCC standards and/or within the range of site-specific background levels. Excavation and assessment activities are ongoing, and future confirmation soil samples will be submitted for analysis of BTEX, TPH, TMB, PAHs, and Ba, based on the waste characterization results. Soil analytical results are summarized in Tables 2 - 5.

Proposed Groundwater Sampling

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

Groundwater was encountered in the wellhead cut and cap excavation areas and various flowline removal potholes at approximately 3 to 6 feet bgs. On December 2, 2022 through January 5, 2023, five (5) groundwater samples (GW01, FL-GW02, 15-11-GW01, 15-11-FL-GW02, and 15-11-GW03) were collected from the wellhead excavations and flowline removal potholes and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-trimethylbenzene (TMB) by USEPA Method 8260D. Analytical results indicated that constituent concentrations in 5 groundwater samples were in compliance with COGCC Table 915 -1 standards. The groundwater sample locations are illustrated on Figures 2 through 4. The groundwater analytical results are summarized in Table 6.

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 December 2, 2022 through January 6, 2023, soil screening was conducted at 8 sidewall locations in the cut and cap excavations, 8 locations at the ground surface adjacent to the excavations, and 16 pothole locations during flowline removal activities. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations, and no soil samples were submitted for laboratory analysis from these areas in accordance with COGCC Operator Guidance. On December 8 and 27, 2022, soil gas surveys were conducted at 3 soil vapor points (SVP) installed adjacent to each of the former wellheads following cut and cap operations. GEM 5000 field readings were non-detect for methane at all 6 soil vapor points. The SVP locations are illustrated on Figures 2 and 3; SVP screening results are summarized in Tables 7 and 8. The laboratory analytical reports are provided as Attachment A. The field notes and a photographic log are provided as Attachment B.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 13

Number of soil samples exceeding 915-1 3

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

Approximate areal extent (square feet) 100

Groundwater

Number of groundwater samples collected 5

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 3

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

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.

NA / ND

-- Highest concentration of TPH (mg/kg) 0.991

-- Highest concentration of SAR 7.16

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

-- Highest concentration of Xylene (µg/l) 2.87

NA Highest concentration of Methane (mg/l)

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-BG04@3' and WH-BG01@6' - WH-BG04@6' were collected from native material adjacent to wellhead cut and cap excavation areas. Additionally, background soil samples BG01@4' - BG04@4', BG05@5', BG05@8', and BG06@4' - BG08@4' were collected from the nearby PSC 15-11 separator site. The background soil samples were submitted for laboratory analysis of select Table 915-1 metals and/or the Soil Suitability for Reclamation Parameters using standard COGCC-approved methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are presented in Tables 4 and 5.

☐ 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?

Excavation and assessment activities to address remaining soil impacts along the former PSC 15-11 flowline 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.

Excavation and assessment activities to address remaining soil impacts along the former PSC 15-11 flowline are ongoing, and no material has been transported off-site for disposal to-date. Pending excavation activities, impacted soils will be removed from the site and transported to a licensed disposal facility. Disposal records will be kept on file and available upon request.

REMEDICATION 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 analytical results indicate that constituent concentrations in the confirmation soil samples collected during wellhead cut and cap operations were in compliance with COGCC Table 915-1 standards and/or within the range of site-specific background levels, with exception to the pH value in sample WH-B01@6'. However, the pH result was within the acceptable range of soil variability, and it alone does not indicate that a hydrocarbon or produced water release occurred at the former PSC 37-11 wellhead location. Due to the depth of the elevated pH result, it was determined to be acceptable to leave in place. Laboratory analytical results indicate that impacted soil remains along the former PSC 15-11 flowline, at sample locations 15-11-FL-B07@4' and 15-11-FL-B09@4', due to TMB, PAHs, and Ba. Excavation and assessment activities to address remaining soil impacts along the former PSC 15-11 flowline are ongoing and will be summarized in a forthcoming Form 27-Supplemental update. Estimated time to attain NFA is TBD based on the extent of impacted soil.

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 COGCC 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.

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 Remediation progress update

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 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: \$ 10000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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:

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? No _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes _____

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. 01/06/2023

Actual Spill or Release date, or date of discovery. 01/06/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/02/2022

Proposed site investigation commencement. 12/02/2022

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/05/2023

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

Excavation and site assessment activities to address remaining soil impacts along the former PSC 15-11 flowline are currently ongoing, and will be summarized in a forthcoming Form 27-Supplemental update. Form 27-Supplemental updates will continue to be submitted to the COGCC on a quarterly basis.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Gregory Hamilton

Title: Environmental Consultant

Submit Date: 03/02/2023

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: Taylor Robinson

Date: 04/06/2023

Remediation Project Number: 25182

COA Type

Description

	Operator shall define the vertical and lateral extent of impacts over Protection of Groundwater Soil Screening Level Concentrations prior to requesting closure.
	Operator will continue quarterly reporting until the site investigation is complete and the implementation schedule can be updated.
2 COAs	

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

403331515	FORM 27-SUPPLEMENTAL-SUBMITTED
403333472	ANALYTICAL RESULTS
403333521	PHOTO DOCUMENTATION
403333527	OTHER
403333531	SITE MAP
403333532	OTHER
403333556	SOIL SAMPLE LOCATION MAP
403333557	SOIL SAMPLE LOCATION MAP
403333560	ANALYTICAL RESULTS
403333584	SOIL SAMPLE LOCATION MAP
403333591	ANALYTICAL RESULTS

Total Attach: 11 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)