

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

403929578

Receive Date:

09/25/2024

Report taken by:

Kari Brown

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		Phone: (720) 929-4306
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Erik Mickelson	Email: DJRemediation_Forms@oxy.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33963 Initial Form 27 Document #: 403654897

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 #: 123-23494	County Name: WELD
Facility Name: MCHALE 2-5	Latitude: 40.173680	Longitude: -104.911690	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 5	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 486440	API #: _____	County Name: WELD
Facility Name: McHale 2-5 WH Historical Release	Latitude: 40.173680	Longitude: -104.911690	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 5	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW

Most Sensitive Adjacent Land Use Non-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

Multiple buildings and livestock holding pens are located within 1/4 mile of the wellhead.
The nearest occupied building is located approximately 420 feet northwest of the wellhead.
The nearest domestic water well is located approximately 470 feet northwest of the wellhead.
Surface water is located approximately 580 feet south of the wellhead.
An area with wetland characteristics is located approximately 40 feet west of the wellhead.

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
Yes	SOILS	10' (N-S) x 10' (E-W) x 6' bgs	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 McHale 2-5 wellhead on February 22, 2024. Groundwater was not encountered in the cut and cap excavation area. Soil screening around the well and associated pumping equipment was conducted following cut and cap operations, and a soil sample (WH-B01@6') was submitted for laboratory analysis. Removal of the flowline associated with this wellhead was initiated on February 22, 2024. A soil sample was collected from the location where the flowline riser was disconnected at the wellhead (FL-B01@4') and submitted for laboratory analysis. The soil samples were submitted for laboratory analysis of the full Table 915-1 analytical suite. Laboratory analytical results indicated that the lead (Pb), pH, and/or sodium adsorption ratio (SAR) results for samples WH-B01@6' and FL-B01@4' exceeded the Table 915-1 standards and site-specific background levels (x1.25 for metals). As such, 2 verification soil samples (WH-B01R@6' and FL-B01R@4') were collected on March 18, 2024, and were submitted for laboratory analysis of Pb, pH, and/or SAR only, to confirm the initial results. Analytical results for the verification samples confirmed that the Pb and pH results exceeded the Table 915-1 standards and site-specific background levels (x 1.25 for metals). As such, Form 19-Initial/Supplemental Spill/Release Report (Document No. 403739881) was submitted on April 3, 2024, and the ECMC issued Spill/Release Point ID 486440. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figure 1. Excavation and/or site assessment activities to address remaining soil impacts have not yet been initiated and will be summarized in a forthcoming Form 27-Supplemental update. Additional flowline removal activities are pending and will be summarized in a forthcoming Form 27-Supplemental update.

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 February 22 and March 18, 2024, a total of 4 confirmation and verification soil samples were collected from the base of the cut and cap excavation area, and from the location where the flowline riser was disconnected at the wellhead, as described above. Analytical results indicate that impacted soil remains at the former wellhead/flowline riser location due to Pb and pH. The remaining analytical results for the confirmation/verification soil samples were in compliance with Table 915-1 standards and/or within site-specific background levels (x1.25 for metals). Excavation and/or assessment activities to address remaining soil impacts at the former wellhead/flowline riser location have not yet been initiated and will be summarized in a forthcoming Form 27-Supplemental update. Based on the analytical results received to date, future confirmation soil samples will be submitted for analysis of BTEX, TPH, TMB, PAHs, pH, SAR, and select Table 915-1 metals (As, Ba, Cd, Cu, Pb, Ni, Se, Zn).

Proposed Groundwater Sampling

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

Groundwater has not been encountered during the wellhead cut and cap or flowline riser removal operations completed to-date. If groundwater is encountered during forthcoming excavation and/or site assessment activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-TMB, using standard methods appropriate for detecting the target analytes in Table 915-1.

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 February 22, 2024, field screening of soils was conducted at 4 sidewall locations within the cut and cap excavation area, and 4 locations at the ground surface adjacent to the excavation. 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 ECMC Operator Guidance. On February 26, 2024, a soil gas survey was conducted at 5 soil vapor points (SVP01 - SVP05) installed adjacent to the former wellhead following cut and cap operations. GEM 5000 field readings were non-detect for methane at all 5 soil vapor points. The SVP locations are illustrated on Figure 1. The SVP screening results are summarized in Table 6. 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 4

Number of soil samples exceeding 915-1 4

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

Approximate areal extent (square feet) 100

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

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

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 5.55

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

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)

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

Twenty-two (22) background soil samples were collected from undisturbed native material adjacent to the wellhead cut and cap excavation area, at comparable depths and soil composition to the confirmation soil samples. The background soil samples were submitted for laboratory analysis of Table 915-1 metals and the Soil Suitability for Reclamation Parameters, using standard ECMC-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. The background soil sample locations are illustrated on Figure 1.

☐ 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?

Historically impacted soil remains in the wellhead/flowline riser excavation area due to Pb and pH. Excavation and/or site assessment activities to address remaining soil impacts at the former wellhead/flowline riser location have not yet been initiated and will be summarized in a forthcoming Form 27 - Supplemental update. Additional flowline removal activities are pending 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.

Historically impacted soil remains in the wellhead/flowline riser excavation area due to Pb and pH. Excavation and/or site assessment activities to address remaining soil impacts at the former wellhead/flowline riser location have not yet been initiated, and no soils have been removed from the site to date. Impacted soils will be removed and transported to a licensed disposal facility in accordance with Rules 905 and 906. 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.

Historically impacted soil remains in the wellhead/flowline riser excavation area due to Pb and pH. Excavation and/or site assessment activities to address remaining soil impacts at the former wellhead/flowline riser location have not yet been initiated, and will be summarized in a forthcoming Form 27-Supplemental update. Based on the analytical results received to date, future confirmation soil samples will be submitted for analysis of BTEX, TPH, TMB, PAHs, pH, SAR, and select Table 915-1 metals (As, Ba, Cd, Cu, Pb, Ni, Se, Zn). Additional flowline removal activities are pending 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 remaining.

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 Project Status 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 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: \$ 7500

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

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? 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 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? No

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? Yes

If YES, does the seed mix comply with local soil conservation district recommendations? Yes

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 11/30/2025

Proposed date of completion of Reclamation. 12/31/2025

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. 04/02/2024

Actual Spill or Release date, or date of discovery. 04/02/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/22/2024

Proposed site investigation commencement. 02/22/2024

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/30/2024

Proposed date of completion of Remediation. 12/31/2024

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

Assessment activities are on-going. Additional details will be provided in a subsequent Form 27.

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: 09/25/2024

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: Kari Brown

Date: 11/13/2024

Remediation Project Number: 33963

COA Type**Description**

	ECMC has processed this form as an update; no analytical was attached thus approval of this form does not imply any agreement with comments on completion of site investigation. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
1 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**

403929578	FORM 27-SUPPLEMENTAL-SUBMITTED
-----------	--------------------------------

Total Attach: 1 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)