

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Report taken by:

Grace Rollins

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 ECOM 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: (970) 336-3500
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Phil Hamlin	Email: Phillip_Hamlin@oxy.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11278 Initial Form 27 Document #: 401612782

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

No Multiple Facilities

Facility Type: SPILL OR RELEASE	Facility ID: 454088	API #: _____	County Name: WELD
Facility Name: Hatch UPRR 42-11 #1	Latitude: 40.241442	Longitude: -104.735102	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 11	Twp: 3N	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Agriculture

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Livestock approximately 900 feet (ft) north-northwest and excavation groundwater approximately 12 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
Yes	GROUNDWATER	See attached data	Groundwater Samples/Lab Analysis
Yes	SOILS	22' N-S x 14' E-W x 17' bgs	Soil Samples/Lab Analysis

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

An operator discovered a corrosion hole in an oil tank at the Hatch UPRR 42-11 1 tank battery. The volume of the release is unknown. The petroleum hydrocarbon impacted soil was excavated.

Decommissioning activities were conducted at the Hatch UPRR 42-11 1 facility on October 11, 2024. All soil samples were within the ECMC Table 915-1 allowable levels or background levels. Please refer to Remediation No. 23516 for more details.

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 February 7 and 12, 2018, nine soil samples were collected from the excavation base and sidewalls for laboratory analysis of total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), pH, and specific conductivity (EC). Laboratory analytical results indicated that TPH, BTEX, pH, and EC concentrations and levels were in full compliance with applicable Energy and Carbon Management Commission (ECMC) standards at the time of sampling at the extent of the excavation.

Decommissioning activities were conducted at the Hatch UPRR 42-11 1 facility on October 11, 2024. All soil samples were within the ECMC Table 915-1 allowable levels or background levels. Please refer to Remediation No. 23516 for more details.

Proposed Groundwater Sampling

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

On February 12, 2018, groundwater sample GW01 was collected from the excavation and submitted for BTEX analysis. Laboratory analytical results indicated sample GW01 exceeded the applicable ECMC allowable levels at the time of sampling for benzene and total xylenes at concentrations of 167 micrograms per liter (µg/L) and 2,180 µg/L, respectively. The excavation groundwater sample location is depicted on Figure 1. The groundwater sample analytical results are summarized in Table 1.

Groundwater has been conducted on a quarterly basis since July 2018.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 9
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 308

NA / ND

-- Highest concentration of TPH (mg/kg) 3870
NA Highest concentration of SAR
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 17

Groundwater

Number of groundwater samples collected 298
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 12
Number of groundwater monitoring wells installed 13
Number of groundwater samples exceeding 915-1 82

-- Highest concentration of Benzene (µg/l) 3200
-- Highest concentration of Toluene (µg/l) 14300
-- Highest concentration of Ethylbenzene (µg/l) 908
-- Highest concentration of Xylene (µg/l) 16800
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?

A background soil sample was submitted to the laboratory and placed on hold for analysis. Laboratory analytical results for the excavated soil samples indicated that pH and EC levels were compliant at the extent of the excavation; therefore, the background soil sample was not run for laboratory analysis.

☐ 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?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 200 cubic yards of petroleum hydrocarbon impacted soil were excavated in 2018 and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling. The impacted soil was excavated into the capillary and phreatic zones to address potential hydrocarbon impacts that may have been present below the current groundwater table due to seasonal fluctuations.

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.

While backfilling the 2018 excavation, 100 pounds of COGAC®, a carbon-based bioremediation product designed to capture and degrade petroleum hydrocarbons via chemical oxidation and passive bio-stimulation, were applied to the clean backfill in a series of lifts in the capillary and phreatic horizons.

As of the April 2023 quarterly monitoring events, monitoring well MW03 exceeded the ECMC Table 915-1 allowable level for benzene, total xylenes, 1,2,4-trimethylbenzene, and/or 1,3,5-trimethylbenzene. Following the January 2022 monitoring event, Kerr-McGee contracted WSP USA to design and implement an air injection (air sparging [AS]) and soil vapor extraction (SVE) system to remediate the residual dissolved-phase impacts to groundwater. Kerr-McGee submitted an Underground Injection Control (UIC) Permit Application to Region 8 of the United States Environmental Protection Agency (USEPA) on April 6, 2022. The application was subsequently approved by the USEPA on April 27, 2022.

Groundwater monitoring on a quarterly basis continues at the site; however, remedial efforts were temporarily placed on hold due to the decommissioning of the Hatch UPRR 42-11 1 O SA Facility (Remediation No. 23156). Current site conditions are under evaluation.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)	Yes	Excavate and offsite disposal
_____ Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) _____ 220
_____ Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or ECMC Facility ID # _____ 149007
_____ Natural Attenuation	No	Excavate and onsite remediation
_____ Other _____		_____ Land Treatment
		_____ Bioremediation (or enhanced bioremediation)
		_____ Chemical oxidation
		_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)

Yes _____ Chemical oxidation

Yes _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____ COGAC® Application

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 MW01 through MW07 and MW09 through MW12 are sampled on a quarterly basis for Table 915-1 organic constituents groundwater. On May 9, 2023, the ECMC approved Kerr-McGee's request to remove the inorganic constituents in Table 915-1 from the ongoing quarterly monitoring program. On March 28, 2024, the ECMC approved the request to remove monitoring well MW08 from the quarterly monitoring program. The monitoring well locations are depicted on Figure 1. A Groundwater Elevation Contour Map generated using the January 2025 survey data is provided as Figure 2. The groundwater analytical results are summarized in Table 1 and the April 2024, July 2024, October 2024, and January 2025 laboratory analytical reports are attached.

During the January 2025 monitoring event, it was determined that monitoring well MW10R was damaged and could not be sampled. Monitoring well MW10R, which is needed for cross-gradient POC for non-compliant well MW06, will be repaired and will continue to be sampled on a quarterly basis following the repairs.

Groundwater monitoring for Table 915-1 organic constituents only will continue on a quarterly basis until a No Further Action status request is warranted.

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

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 ECMC. 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: \$ 90000

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:

The petroleum hydrocarbon impacted soil was excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado, for recycling.

Volume of E&P Waste (solid) in cubic yards 220

E&P waste (solid) description Petroleum hydrocarbon impacted soil

ECMC Disposal Facility ID #, if applicable: 149007

Non-ECMC Disposal Facility:

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

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? No

Is additional groundwater monitoring to be conducted? Yes

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. 02/14/2018

Actual Spill or Release date, or date of discovery. 02/13/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/07/2018

Proposed site investigation commencement. 02/07/2018

Proposed completion of site investigation. 11/13/2019

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/07/2018

Proposed date of completion of Remediation. 02/12/2026

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

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

Signed: Phil Hamlin

Title: Senior Environmental Rep.

Submit Date: 02/25/2025

Email: Phillip_Hamlin@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: Grace Rollins

Date: 03/07/2025

Remediation Project Number: 11278

COA Type**Description**

	In addition to monitoring well MW10R, Operator shall replace monitoring well MW01 for use as a point of compliance well.
	Operator states: "remedial efforts were temporarily placed on hold due to the decommissioning of the Hatch UPRR 42-11 1 O SA Facility (Remediation No. 23156). Current site conditions are under evaluation." ECMC notes that per Form 27 Doc. # 403961898 under Remediation Project # 23156, decommissioning activities were conducted on 10/11/2024. The results of the decommissioning site investigation should be available and should not limit remedial activities pertaining to Remediation Project # 11278 at this time.
2 COAs	

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**

404077665	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404077700	GROUND WATER ELEVATION MAP
404077704	SITE MAP
404077705	ANALYTICAL RESULTS
404077708	ANALYTICAL RESULTS
404077709	ANALYTICAL RESULTS
404077712	ANALYTICAL RESULTS
404077713	ANALYTICAL RESULTS
404120181	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)