FORM 27 Rev 5/22

State of Colorado
Oil and Gas Conservation Commission

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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 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 INFORMATON

Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP Operator No: 47120
Address: P O BOX 173779
City: DENVER State: CO Zip: 80217-3779
Contact Person: Gregory Hamilton Email: Gregory_Hamilton@oxy.com

Phone Numbers
Phone: (970) 515-1698
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16127 Initial Form 27 Document #: 402535560

PURPOSE INFORMATION

- [ ] Rule 913.c.(1): Pit or Cuttings Trench closure.
- [X] Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- [X] 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.
- [X] 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.
- [X] 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.
- [X] Other: Facility Closure

SITE INFORMATION

Yes Multiple Facilities

Facility Type: LOCATION Facility ID: 318890 API #: County Name: WELD
Facility Name: ELLANORA M ACKERSON GAS UNIT-61N67W 2SWSE Latitude: 40.075906 Longitude: -104.853925
** correct Lat/Long if needed: Latitude: 40.075374 Longitude: -104.854371
QtrQtr: SWSE Sec: 2 Twp: 1N Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 479714 API #: County Name: WELD
Facility Name: Ackerson Ellanora M GU 2 Latitude: 40.075374 Longitude: -104.854371
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWSE Sec: 2 Twp: 1N Range: 67W Meridian: 6 Sensitive Area? Yes

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? Yes

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	See attached data.	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	See attached data.	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.

This form has been prepared to summarize assessment activities conducted during the closure of one aboveground storage tank (AST), one partially buried produced water vessel (PWV), one meter house, and one separator at the Ackerson, Ellanora M GU 2 Facility. Assessment activities began on March 19, 2021. Soil assessment activities were conducted in accordance with COGCC Rule 911.a. A photo log is included as an attachment.

On March 31, 2021, upon receipt of the laboratory analytical report for samples collected on March 19, 2021, historically impacted soil was discovered in the facility excavation. Laboratory analytical results indicated the AST soil sample AST01@5", the PWV soil samples PWV-B01@4' and PWV-E01@2.5' and the separator soil samples Flowline01@4' and Flowline02@4' exceeded the COGCC Table 915-1 allowable levels for benzo(a)anthracene, sodium adsorption ratio (SAR), arsenic, barium, and/or lead. The release was reported to the COGCC in the Form 19 Initial dated April 1, 2021 (Document No. 402644557). The volume of the release is unknown. The impacted soil was excavated.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Between March 19, 2021 and March 22, 2022, soil samples were collected from the AST, PWV, separator and ancillary piping (see Figure 1). The soil samples were field screened for total volatile organic compounds using a photoionization detector (PID). Based on PID readings, select soil samples were submitted for laboratory analysis in accordance with COGCC Rule 911.a. The impacted soil was excavated. Analytical results indicated soil was in full compliance with Table 915-1 standards, or within the analytical variability of the background samples at the extents of the excavations. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively. The laboratory reports are attached.

Proposed Groundwater Sampling

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

On April 7 and April 8, 2021, groundwater samples were collected from the AST, PWV, and separator excavations and submitted for Table 915-1 analyses. One background groundwater sample was also collected and submitted for Table 915-1 inorganic parameters. Based on the laboratory analytical results, groundwater samples PWV-GW01 and Separator-GW01 exceeded the COGCC Table 915-1 allowable levels for benzene, 1,2,4-trimethylbenzene, chloride ion, and/or sulfate ion. The excavation groundwater sample and background sample locations are depicted on Figure 1. The groundwater sample analytical results are summarized in Table 3.

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: 114

Number of soil samples exceeeding 915-1: 76

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet): 7700

NA / ND

-- Highest concentration of TPH (mg/kg): 2071.7

-- Highest concentration of SAR: 9.94

BTEX > 915-1: Yes

Vertical Extent > 915-1 (in feet): 17

Groundwater

Number of groundwater samples collected: 3

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet): 5

Number of groundwater monitoring wells installed: 0

Number of groundwater samples exceeding 915-1: 2

-- Highest concentration of Benzene (µg/l): 142

ND Highest concentration of Toluene (µg/l):

-- Highest concentration of Ethylbenzene (µg/l): 38.5

-- Highest concentration of Xylene (µg/l): 304

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?

Four native soil background soil samples were collected for laboratory analysis of specific conductivity (EC), SAR, pH, boron, and metals. Laboratory analytical results indicated pH, SAR, boron, arsenic, barium, and selenium are naturally high in the native soil.

One background groundwater sample was also collected and submitted for Table 915-1 inorganic parameters.

☐ 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?

Groundwater monitoring wells will be installed to delineate the dissolved-phase impacts. The well installation scope of work will be submitted in a subsequent Form 27 Supplemental.

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.

Approximately 700 CY of impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling. Approximately 10844 CY of impacted soil was transported to the Front Range Landfill in Erie, Colorado for disposal. Approximately 320 CY of impacted soil was transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal

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.

The impacted soil has been excavated and transported to a licensed disposal facility.

Groundwater monitoring wells will be installed to delineate the dissolved-phase impacts. A remediation plan will be developed once delineation is completed. The well installation scope of work will be submitted in a subsequent Form 27 Supplemental.

Soil Remediation Summary

☐ **In Situ**

- ____ Bioremediation (or enhanced bioremediation)
- ____ Chemical oxidation
- ____ Air sparge / Soil vapor extraction
- ____ Natural Attenuation
- ____ Other ____

☒ **Ex Situ**

- Yes Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) 11864
  - Name of Licensed Disposal Facility or COGCC Facility ID # 149007
- No Excavate and onsite remediation
  - ____ 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.

Groundwater monitoring wells will be installed to delineate the dissolved-phase impacts. The well installation scope of work will be submitted in a subsequent Form 27 Supplemental.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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 Investigation Update Report

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: $

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:

Approximately 700 CY of impacted soil were transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 11864

E&P waste (solid) description Impacted Soil

COGCC Disposal Facility ID #, if applicable: 149007

Non-COGCC Disposal Facility: Front Range Landfill in Erie, CO (10844 CY) and Buffalo Ridge Landfill in Keenesburg, CO (320 CY)

Volume of E&P Waste (liquid) in barrels 20087

E&P waste (liquid) description Impacted Water

COGCC Disposal Facility ID #, if applicable: 434766

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

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. 03/29/2021

Actual Spill or Release date, or date of discovery. 03/29/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/19/2021

Proposed site investigation commencement. 03/19/2021

Proposed completion of site investigation. 03/19/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/19/2021

Proposed date of completion of Remediation. 06/30/2026

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: Gregory Hamilton Title: Environmental Consultant

Submit Date: 02/16/2023 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: Laurel Anderson Date: 04/25/2023

Remediation Project Number: 16127

COA Type	Description
	Operator shall provide a comprehensive list of all potential receptors within ¼ mile on the subsequent Supplemental Form 27.
	Background samples were collected from areas not representative of background conditions on location near the release area. These samples shall be omitted from future background determination calculations. Operator shall obtain samples from locations sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
	Neither organic nor inorganic contaminants of concern appear to be fully delineated. Operator shall define the vertical and lateral extent of impacts over Protection of Groundwater Soil Screening Level Concentrations.
	This Form 27 Supplemental is being approved as submitted. However, the next Form 27 Supplemental must be fully populated with the Adequacy of Operator's General Liability Insurance and Financial Assurance data field under the Remediation Progress Update tab to describe how Operator's Financial Assurance meets the requirements of Rule 703.b. and General Liability Insurance meets the requirements of Rule 705.b.
4 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
403161159	FORM 27-SUPPLEMENTAL-SUBMITTED
403191121	PHOTO DOCUMENTATION
403198875	SOIL SAMPLE LOCATION MAP
403198876	SOIL SAMPLE LOCATION MAP
403198877	SOIL SAMPLE LOCATION MAP
403198878	SOIL SAMPLE LOCATION MAP
403198880	SOIL SAMPLE LOCATION MAP
403198882	SOIL SAMPLE LOCATION MAP
403198883	SOIL SAMPLE LOCATION MAP
403198884	SOIL SAMPLE LOCATION MAP
403198886	SOIL SAMPLE LOCATION MAP
403198887	SOIL SAMPLE LOCATION MAP
403198888	SOIL SAMPLE LOCATION MAP
403198890	SOIL SAMPLE LOCATION MAP

403198896	ANALYTICAL RESULTS

Total Attach: 15 Files

General Comments

User Group	Comment	Comment Date
Environmental	COGCC added Spill ID 479714 and selected Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912. in addition to the current selection.	04/25/2023

Total: 1 comment(s)