

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404073082  
Receive Date:  
03/27/2025

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 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 Phone: (720) 929-4306 Mobile: ( )
Address: P O BOX 173779		
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Erik Mickelson	Email: Erik_Mickelson@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25902 Initial Form 27 Document #: 403216888

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: TANK BATTERY	Facility ID: 482241	API #: _____	County Name: WELD
Facility Name: Briggs 1-32 Tank Battery	Latitude: 40.257040	Longitude: -104.835700	
** correct Lat/Long if needed: Latitude: 40.256834		Longitude: -104.835566	
QtrQtr: SWNE	Sec: 1	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 483792	API #: _____	County Name: WELD
Facility Name: UP 41 PA I 1 / Briggs O SA Historic	Latitude: 40.257103	Longitude: -104.835767	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 1	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SM

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**

Multiple buildings and livestock holding pens are located within ¼ mile of the facility.  
The nearest building is located approximately 1,210 feet east of the facility.  
The nearest domestic water well is located approximately 1,190 feet southeast of the facility.  
Surface water is located approximately 1,200 feet southwest of the facility.

**DENIED**

# 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	20' (N-S) X 20' (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.

In accordance with the remediation workplan (Rem #38129, Doc #404019399), reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of Kerr-McGee Onshore Oil & Gas LP (KMOG). The pH results in samples SEP1-B03@3' and SEP1-B04@3' was altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48 respectively. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples (BG01@3, BG02@3, BG03@3, and BG04@3) were collected on December 17, 2024. The analytical results of the resample SEP1-B03RS@3 and SEP1-B04RS@3 were 8.05 and 8.13, respectively. The verification samples meet the Table915-1 cleanup concentrations. As such, KMOG is requesting No Further Action for Remediation Project Number 25902.

The analytical data altered by a third-party without the knowledge of and beyond the reasonable control of KMOG can be found in Form 27 Document No. 403383440. The original unaltered lab report and the reassessment analytical results are attached. The original sample results and the reassessment sample results are provided in Table 1. A topographic Site Location Map is provided as Figure 1. The reassessment sample locations are provided on Figure 2.

## 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 ):

### Proposed Groundwater Sampling

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

### 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 25  
Number of soil samples exceeding 915-1 6  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 400

**NA / ND**

-- Highest concentration of TPH (mg/kg) 2.28  
-- Highest concentration of SAR 9.56  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 6

**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 \_\_\_\_\_

\_\_\_\_ 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) \_\_\_\_\_

**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?
- 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? No

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

On February 15 through April 5, 2023, approximately 10 cubic yards of impacted material were excavated and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling; approximately 70 cubic yards of impacted material were excavated and transported to the Front Range Landfill in Erie, Colorado for disposal. The excavation areas were subsequently backfilled and contoured to match pre-existing site conditions.

**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.

In accordance with the remediation workplan (Rem #38129, Doc #404019399), reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of Kerr-McGee Onshore Oil & Gas LP (KMOG). The pH results in samples SEP1-B03@3' and SEP1-B04@3' was altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48 respectively. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples (BG01@3, BG02@3, BG03@3, and BG04@3) were collected on December 17, 2024. The analytical results of the resample SEP1-B03RS@3 and SEP1-B04RS@3 were 8.05 and 8.13, respectively. The verification samples meet the Table 915-1 cleanup concentrations. As such, KMOG is requesting No Further Action for Remediation Project Number 25902.

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**Soil Remediation Summary**

In Situ

Ex Situ

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

- Yes Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 80
- \_\_\_\_\_ Name of Licensed Disposal Facility or ECMC 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.

# REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

### Approved Reporting Schedule:

Quarterly  Semi-Annually  Annually  Other Final Report

### 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 NFA Request

## 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: \$ 0

## 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 10 cubic yards of impacted material were 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 80

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable: 149007

Non-ECMC Disposal Facility: Front Range Landfill - Erie, Colorado

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? Yes

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? 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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The site has been reclaimed in accordance with ECMC 1000 Series Reclamation Rules.

Is the described reclamation complete? Yes

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. 07/31/2024

Proposed date of completion of Reclamation. 08/31/2024

## 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. 01/31/2023

Actual Spill or Release date, or date of discovery. 01/31/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/26/2023

Proposed site investigation commencement. 01/26/2023

Proposed completion of site investigation. 12/17/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

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:

In December 2024, reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of KMOG.

## OPERATOR COMMENT

In accordance with the remediation workplan (Rem #38129, Doc #404019399), reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of Kerr-McGee Onshore Oil & Gas LP (KMOG). The pH results in samples SEP1-B03@3' and SEP1-B04@3' was altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48 respectively. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples (BG01@3, BG02@3, BG03@3, and BG04@3) were collected on December 17, 2024. The analytical results of the resample SEP1-B03RS@3 and SEP1-B04RS@3 were 8.05 and 8.13, respectively. The verification samples meet the Table 915-1 cleanup concentrations. As such, KMOG is requesting No Further Action for Remediation Project Number 25902.

The lab report (Lab ID Y302302) altered by a third-party without the knowledge of and beyond the reasonable control of KMOG was originally submitted to the ECMC as Attachment Document No. 403384190. An original locked version of lab report Y302302 is attached to this form as a replacement.

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: 03/27/2025

Email: Erik\_Mickelson@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:

Date:

Remediation Project Number: 25902

## COA Type

## Description

COA Type	Description
0 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

Att Doc Num	Name
404073082	FORM 27 DENIED
404142808	ANALYTICAL RESULTS
404142809	ANALYTICAL DATA SUMMARY TABLE(S)
404143232	ANALYTICAL RESULTS
404143236	SITE MAP
404143237	SOIL SAMPLE LOCATION MAP
404143239	OTHER
404172121	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

## General Comments

## User Group

## Comment

## Comment Date

User Group	Comment	Comment Date
Environmental	All analytical from Document #403384190 shall be reissued and provided with the replacement form.	04/16/2025
Environmental	"Per COA on Form 27i Doc #404019399: ""When reporting the analytical results for the Remediation Projects described in this Form 27 Initial, Operator will identify and highlight in text, tables, and figures the previously altered data and include unaltered original lab reports, as well as document the resampling results."" Operator has not provided annotated/highlighted versions of text/tables/figures previously provided under this remediation project.  Per COA on Form 27i Doc #404019399: ""ECMC reserves the right to require additional site investigation and remediation based on its review of site specific data for any of the listed projects as necessary to satisfy the requirements of Rule 913 and 915.""	04/01/2025

Environmental	<p>Operator states: "The pH results in samples SEP1-B03@3' and SEP1-B04@3' was altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48 respectively. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples (BG01@3, BG02@3, BG03@3, and BG04@3) were collected on December 17, 2024. The analytical results of the resample SEP1-B03RS@3 and SEP1-B04RS@3 were 8.05 and 8.13, respectively. The verification samples meet the Table 915-1 cleanup concentrations. As such, KMOG is requesting No Further Action for Remediation Project Number 25902."</p> <p>ECMC does not approve Operator's request for No Further Action and has denied the subject Form for the following reasons:  -A pH of 8.63 and 8.48 from soil samples SEP1-B03@3' and SEP1-B04@3' are indicative of a spill/release and therefore require confirmation sampling for complete Table 915-1 contaminants of concern.  -Per Rule 915.e.(2)A. If soil contamination is suspected or known to exist as a result of Spills or Releases or E&amp;P Waste management, Operators will collect and analyze representative samples of soil pursuant to this Rule 915.e.(2).  -Operator shall submit a replacement Form 27 Supplemental for this Remediation Project proposing additional site investigation to properly characterize the vertical and lateral extent of the historic release.</p>	03/27/2025
Environmental	ECMC Staff accepts the information as provided in this form. By reviewing this form, ECMC Staff does not determine fault for any alleged wrongful actions. As provided by Rule 201.b., Operators must ensure compliance with ECMC Rules by all consultants, contractors, and subcontractors.	03/27/2025
Environmental	"This form was reviewed by the following ECMC personnel prior to denial: Area Environmental Protection Specialist Area Supervisor Environmental Data Group Supervisor"	03/27/2025

Total: 5 comment(s)