

State of Colorado  
Energy & Carbon Management 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 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) 9294306  
City: DENVER State: CO Zip: 80217-3779 Mobile: ( )  
Contact Person: Erik Mickelson Email: DJRemediation\_Forms@oxy.com

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25178 Initial Form 27 Document #: 403169950

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: TANK BATTERY Facility ID: 479835 API #: County Name: WELD  
Facility Name: 35-3N-66W SWNE Brown and Cannon TB Latitude: 40.185700 Longitude: -104.741100  
\*\* correct Lat/Long if needed: Latitude: 40.185823 Longitude: -104.741161  
QtrQtr: SWNE Sec: 35 Twp: 3N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Non-crop land  
Is domestic water well within 1/4 mile? No 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**

Surface water is located approximately 590 feet to the northeast of the facility.

**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
UNDETERMINED	SOILS	TBD	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.

Tank battery decommissioning activities were conducted at the Cannon 1&7-35A/UP 22 Q O SA Production Facility location on October 3 and 5, 2022, under Remediation Project No. 25176 and 24950. Visual inspection and field screening of soils was conducted following tank battery decommissioning activities, and two confirmation soil samples were collected from the former separator (SEP) locations, at depths ranging from approximately 3 to 4 feet below ground surface (bgs), and submitted for laboratory analysis to determine if a release occurred, as described in the form 27-Initial of Remediation Project No. 25176 (Document no. 403271845) and Remediation Project No. 24950 (Document no. 403265734). Analytical results for the soil samples collected during facility decommissioning activities were in compliance with the applicable ECMC Table 915-1 standards and/or site-specific background levels (x 1.25 for metals). The remaining separator was left in place and will be removed at a later date.

**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 October 3 and 5, 2022, two confirmation soil samples (FL-B02@4' and FL-B09@3') were collected from the former SEP locations, and submitted for laboratory analysis to determine if a release occurred, as described in the form 27-Initial of Remediation Project No. 25176 (Document no. 403271845) and Remediation Project No. 24950 (Document no. 403265734). Analytical results for the soil samples collected during facility decommissioning activities were in compliance with the applicable ECMC Table 915-1 standards and/or site-specific background levels (x 1.25 for metals).

**Proposed Groundwater Sampling**

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

Groundwater was not encountered during facility decommissioning activities.

**Proposed Surface Water Sampling**

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

Empty text box for surface water sampling details.

**Additional Investigative Actions**

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

Empty text box for additional investigative actions.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 2  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 0

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 0.241  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 0

### 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?

Eight (8) background soil samples were collected from undisturbed native material adjacent to nearby Cannon Land 7-35 Wellhead location, at comparable depths an soil composition to the waste characterization and confirmation soil samples. Additionally, eight (8) background soil samples were collected from undisturbed native material adjacent to nearby Brown 24-35 X Wellhead location, at comparable depths an soil composition to the waste characterization and confirmation soil samples. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters using standard methods appropriate for detecting the target analytes in Table 915-1.

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?

## 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.

Analytical results for the soil samples collected during facility decommissioning activities were in compliance with the applicable ECMC Table 915-1 standards and/or site-specific background levels (x 1.25 for metals). As such, no soils were removed from this location.

### 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.

Tank battery decommissioning activities were conducted at the Cannon 1&7-35A/UP 22 Q O SA Production Facility location on October 3 and 5, 2022, under Remediation Project No. 25176 and 24950. Analytical results for the soil samples collected during facility decommissioning activities were in compliance with the applicable ECMC Table 915-1 standards and/or site-specific background levels (x 1.25 for metals). Groundwater was not encountered during facility decommissioning activities. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

### 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 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?

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? 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? No

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.

Following the completion of excavation and assessment activities, the site will be restored to its pre-release grade and reclaimed in accordance with ECMC 1000 Series Reclamation Rules. Timeliness of reclamation initiation and completion will be subject to NFA, surface owner discretion and land use, and suitable ground conditions which allow for execution of surface reclamation activities so as to not cause unwarranted damages.

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. 06/30/2025

Proposed date of completion of Reclamation. 09/30/2025

## 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. 07/28/2022

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/03/2022

Proposed site investigation commencement. 10/03/2022

Proposed completion of site investigation. 10/05/2022

### 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:

\_\_\_\_\_

**OPERATOR COMMENT**

Assessment is complete and Kerr-McGee is requesting an NFA determination for this location, based on the analytical and soil screening data provided herein.

Two separators were removed under Cannon Land 7-35 (Remediation Project No. 25176) under approved closure request (Document No. 403271845), and Brown 25-35 X (Remediation Project No. 24950), under approved closure request (Document No. 403265734).

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: 06/04/2025 \_\_\_\_\_

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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 25178 \_\_\_\_\_

**COA Type****Description**

0 COA	
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**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**

404135291	FORM 27 DENIED
404135814	SITE MAP
404135815	SOIL SAMPLE LOCATION MAP
404135817	SOIL SAMPLE LOCATION MAP
404135819	SOIL SAMPLE LOCATION MAP
404136970	SITE MAP
404136971	ANALYTICAL RESULTS
404136972	ANALYTICAL RESULTS
404136998	PHOTO DOCUMENTATION
404137021	ANALYTICAL RESULTS
404338082	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 11 Files

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

Environmental	ECMC has denied this Form 27 and NFA request as Operator has not conducted the investigation in accordance with the previously approved workplan. Operator shall collect soil samples from below the dump lines exiting the former separators. Operator shall analyze soil samples for the complete Table 915-1 Contaminants of Concern.	09/02/2025
Environmental	Operator submitted this form outside of the approved reporting schedule (Quarterly). In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days); additional violations may result in enforcement.	09/02/2025
Environmental	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.	09/02/2025

Total: 3 comment(s)