

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Candice (Nikki) Graber

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: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Phone: <u>(713) 350-4906</u>
	Zip: <u>80217-3779</u>	Mobile: <u>()</u>
Contact Person: <u>Ariana Ochoa</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36368 Initial Form 27 Document #: 403845476

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: Request Director's Approval to establish site specific waste profile

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-29632</u>	County Name: <u>WELD</u>
Facility Name: <u>PIONEER 4-12</u>	Latitude: <u>40.158883</u>	Longitude: <u>-104.613856</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>12</u>	Twp: <u>2N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488802</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Pioneer 4-12 Wellhead</u>	Latitude: <u>40.158883</u>	Longitude: <u>-104.613856</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>12</u>	Twp: <u>2N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Surface Water

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

Box Elder Creek 880 feet (ft) east. Klug Lake 1,050 ft southeast. Agriculture. The site is located within a Bald Eagle Active Nest Site 1/2 Mile and within 1/4 mile of the Aquatic Native Species Conservation Waters and Mule Deer Migration Corridor High Priority Habitat (HPH) areas.

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	GROUNDWATER	TBD	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	TBD	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 Pioneer 4-12 wellhead on 11/19/2024. Groundwater was not encountered during wellhead cut and cap operations. Visual inspection and field screening of soil around the wellhead and associated pumping equipment were conducted following cut and cap operations. A soil sample [B01(4-12)@6'] was submitted for analysis of full list to determine if a release occurred. The flowline associated with the wellhead was removed between 11/19 and 11/27/2024. Samples were collected from the locations where the flowline risers were disconnected from the wellhead [WH01-RISER(4-12)@3'] and from the separator [SEP01-RISER(2,4-12)@4'] and from where the flowline changed directions [FL01(4-12)@3', FL02(4-12)@5', and FL03(4-12)@5']. Samples were submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. Initial laboratory analytical results indicated that benzo(a) anthracene and lead impacts exceeding the Table 915-1 allowable levels and background levels are present at the B01(4-12)@6' location. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 404043440) was submitted on 1/2/2025 and the ECMC issued Spill/Release Point ID 488802. A verification sample was collected at the B01(4-12)@6' location to confirm the initial lead results. Final analytical results confirmed that lead impacts exceeding the Table 915-1 allowable levels are present at the B01(4-12)@6' location. The wellhead excavation and flowline are depicted on Figures 1 and 2. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively. The Form 44 is attached.

Excavation activities are pending due to the 1/2 mile Bald Eagle Nest HPH and details will be provided in a subsequent Form 27 supplemental report.

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 11/19 and 11/27/2024, soil samples were collected from the wellhead excavation [B01(4-12)@6'], locations where flowline risers were disconnected from the wellhead [WH01-RISER(4-12)@3'] and from the separator [SEP01-RISER(2,4-12)@4'], and from where the flowline changed directions [FL01(4-12)@3', FL02(4-12)@5', and FL03(4-12)@5'] at depths ranging from 3 ft below ground surface (bgs) to 6 ft bgs. The samples were submitted for analysis of full Table 915-1 constituents, using ECMC-approved methods. Initial laboratory analytical results indicated that benzo(a) anthracene and lead impacts exceeding the Table 915-1 allowable levels and background levels are present at the B01(4-12)@6' location. A verification sample was collected and confirmed that lead impacts exceeding the Table 915-1 allowable levels are present at the B01(4-12)@6' location. Excavation activities are pending. The laboratory reports are attached.

Proposed Groundwater Sampling

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

Groundwater was not encountered during wellhead cut and cap or flowline removal activities.

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):

Between 11/19 and 11/22/2024, visual inspection and field screening of soil were conducted at four sidewall locations within the cut and cap excavation area, four locations at the ground surface adjacent to the cut and cap excavation area, and fourteen flowline potholes. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the screening locations, and no soil samples were submitted for laboratory analysis from these areas, in accordance with the ECMC Operator Guidance. A photographic log is attached.

On 12/6/2024, a soil gas survey was conducted at five soil vapor points installed adjacent to the former wellhead location following cut and cap operations. GEM 5000 field readings were all non-detect for methane at all soil vapor points. The soil vapor point locations are illustrated on Figure 1. The soil vapor field form is included as an attachment.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 12

Number of soil samples exceeding 915-1 7

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

Approximate areal extent (square feet) 100

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 4.81

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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?

Twelve background soil samples (NATIVE-BG01@3' through NATIVE-BG06@3' and NATIVE-BG01@6' through NATIVE-BG06@6') were collected from the native material outside of the wellhead excavation area. The background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and ECMC Table 915-1 metals, using ECMC-approved methods. Analytical results indicate that EC, SAR, and arsenic are naturally high in the native soil. The background soil sample analytical results are summarized in Table 2. 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?

Excavation activities are pending due to the ½ mile Bald Eagle Nest HPH and details will be provided in a subsequent Form 27 supplemental report.

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.

Impacted soil from the wellhead excavation will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of assessment activities. Disposal records are kept on file and available upon request. The excavation areas will be backfilled and contoured to match pre-existing conditions.

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.

Laboratory data indicate that benzo(a)anthracene and lead impacts exceeding the ECMC Table 915-1 allowable levels and background levels remain in the wellhead excavation area. Groundwater was not encountered during wellhead cut and cap or flowline removal activities. Excavation activities are pending due to the 1/2 mile Bald Eagle Nest HPH and details will be provided in a subsequent Form 27 supplemental report.

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 _____

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 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: \$ 11500 _____

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? 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? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

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? _____

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. 12/30/2024

Actual Spill or Release date, or date of discovery. 12/30/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/19/2024

Proposed site investigation commencement. 11/19/2024

Proposed completion of site investigation. 09/25/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/19/2024

Proposed date of completion of Remediation. 09/25/2026

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

Per Rule 915.e.(2).C, a discrete grab sample [B01(4-12)@6'] was collected from the most impacted material available in the source area on 11/19/2024. The laboratory report and results summary table are attached. Based on these results, KMOG requests approval to amend confirmation sampling and analysis to only include hydrocarbon and metal analytes detected above laboratory reporting limits and reclamation parameters exceeding Table 915-1 allowable levels, specifically: polycyclic aromatic hydrocarbons (PAHs), pH, boron, arsenic, barium, cadmium, lead, and nickel.

KMOG will not conduct operations related to this form between 12/1 – 7/31 in compliance with the 0.5 mile Bald Eagle Nesting Buffer.

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

Signed: Ariana Ochoa

Title: Sr. HSE Advisor

Submit Date: 09/29/2025

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: Candice (Nikki) Graber

Date: 09/29/2025

Remediation Project Number: 36368

COA Type**Description**

	Operator shall establish and maintain quarterly reporting.
	ECMC approves the proposed remediation work plan. However ECMC does not approve the proposed schedule. The Operator shall implement the proposed work plan upon approval of this Form 27, or propose a site specific timeline for implementation including reasons for specific dates selected. No justification was given for the continued delay proposed to complete the site investigation and remediation.
	Operator shall include BTEX, TPH, in addition to the proposed sampling analysis: all polycyclic aromatic hydrocarbons (PAHs), pH, boron, arsenic, barium, cadmium, lead, and nickel.
3 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**

404363664	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404366197	ANALYTICAL DATA SUMMARY TABLE(S)
404366946	LABORATORY ANALYTICAL REPORT
404371324	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

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

Environmental	Work was conducted in December of 2024 and no additional remediation has been conducted. Operator is out of compliance with 913.d.(1) (Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered).	09/29/2025
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Total: 1 comment(s)