

State of Colorado
Energy & Carbon Management Commission

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29958 Initial Form 27 Document #: 403436002

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: <u>LOCATION</u>	Facility ID: <u>318687</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DECHANT 27-12</u>	Latitude: <u>40.154760</u>	Longitude: <u>-104.604150</u>	
** correct Lat/Long if needed: Latitude: <u>40.154379</u>		Longitude: <u>-104.603296</u>	
QtrQtr: <u>SENE</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>485091</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Dechant 1-12, 17-12 O SA</u>	Latitude: <u>40.154379</u>	Longitude: <u>-104.603296</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</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 SP

Most Sensitive Adjacent Land Use 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

Domestic water well: none
Surface water: approximately 850' NW
Wetlands: areas with wetland characteristics are located approximately 840' NW and 892' NW
Spring: none
Livestock: none
Occupied Building: none
High Priority Habitats: within a 1/4 mile of Aquatic Native Species Conservation Waters and Mule Deer Migration Corridor area

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	Groundwater not encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	78' (N-S) x 24' (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.

Decommissioning activities were completed at the Dechant 1-12 17-12 O SA production facility on August 29 and September 1, 2023. Groundwater was not encountered during excavation activities. Visual inspection and field screening of soils at one separator, one meter house, one produced water vessel (PWV), five dump line removal potholes, two aboveground storage tanks (ASTs), and one emissions control device (ECD) were conducted following removal activities and soil samples (AST-B01@3", AST-B03@3", SEP-B01@3", SEP-B02@3", DL-B04@3", PW-B01@4', PW-N01@3', PW-E01@3', PWS01@3', PW-W01@3') were submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results indicated that the benzene, naphthalene, 1,2,4-trimethylbenzene (TMB), 1-methylnaphthalene, and 2-methylnaphthalene, and arsenic concentrations in DL-B04@3' exceeded the applicable ECMC Table 915-1 standards and site-specific background limits. As such, a Form 19 Initial/Supplemental Spill/Release Report (ECMC Document No.403516295) was submitted on August 31, 2023 and the ECMC issued Spill/Release Point ID 485091. Soil sample DL-B04@3' (waste characterization sample) was submitted for laboratory analysis of the full ECMC Table 915-1 analytical suite. Soil sample location and field screening data is presented in Table 1. Soil analytical results are summarized in Tables 2 through 5. The facility soil sample and field screening locations are illustrated on Figure 1. The field notes and photographic log are provided as Attachment A.

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):

From 8/29/23 - 9/20/23, excavation activities beneath the former liner were conducted to address remaining soil impacts at the former dump line and PWV location and 16 confirmation soil samples were collected from the base and sidewalls of the final excavation extent, at depths ranging from approximately 4' - 6' bgs. Based on the waste characterization results (DL-B04@4'), the confirmation soil samples were submitted for analysis of benzene, ethylbenzene, xylenes, TPH, naphthalene, 1,2,4-TMB, pH, 1-methylnaphthalene, 2-methylnaphthalene, benzo(a)anthracene, chrysene, arsenic, barium, and selenium using ECMC-approved methods. Analytical results indicated that constituent concentrations in the soil samples collected from the final excavation extents were in compliance with the applicable ECMC Table 915-1 standards and/or within background limits. Additional verification samples will be collected from the final excavation extent to confirm Table 915-1 compliance.

Proposed Groundwater Sampling

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

Groundwater was not encountered during assessment or remediation 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):

On August 29, 2023, visual inspections and field screening of soils was conducted at the former meter house, 3 dump line removal potholes, two former ASTs, and the former ECD. Based on the inspection and screening results, hydrocarbon-impacted soils were not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the ECMC Operator Guidance for Oil & Gas Facility Closure document.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 32
Number of soil samples exceeding 915-1 29
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1872

NA / ND

-- Highest concentration of TPH (mg/kg) 0.894
-- Highest concentration of SAR 5.68
BTEX > 915-1 Yes
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?

Background soil samples PW-BG01@3"-PW-BG02@3", PW-BG03@3' - PW-BG04@3', PW-BG03@5' - PW-BG04@5', PW-BG05@4' - PW-BG06@4', and PW-BG05@5' - PW-BG06@6' were collected from non-impacted native material (Valent sand, sand) adjacent to the produced water vessel excavation. Additional background soil samples collected from the Dechant 17,27-17 wellhead (located approximately 200' W) from similar soil type (Valent sand, sand), depth, and land use have been included. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters and Table 915-1 Metals in Soils using standard methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are presented in Tables 3 and 5. Background sample locations are illustrated on Figures 1 through 4.

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?

Additional verification samples will be collected from the final excavation extent to confirm Table 915-1 compliance.

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.

From August 29, 2023 - September 20, 2023, approximately 350 cubic yards of impacted material were excavated and transported to the Buffalo Ridge Landfill located in Keenesburg, Colorado for disposal. The excavation area will be backfilled and contoured to match pre-existing 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.

Laboratory analytical results indicated that constituent concentrations in the soil samples collected from the final excavation extent were in compliance with the applicable ECMC Table 915-1 standards and/or within background limits. Groundwater was not encountered during assessment or remediation activities. Per COAs on previous Form 27-Supplementals, additional verification samples will be collected from the final excavation extent to confirm Table 915-1 compliance.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 350

_____ 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.

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 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. 06/14/2023

Actual Spill or Release date, or date of discovery. 08/30/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/29/2023

Proposed site investigation commencement. 06/29/2023

Proposed completion of site investigation. 05/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/29/2023

Proposed date of completion of Remediation. 05/31/2025

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

In response to the comments on the previously denied Form 27-Supplemental (Document #403865250, denied on 11/14/25):

-Verification samples will be collected from the final excavation extent and submitted for the remaining Table 915-1 analysis that were not previously analyzed.
 -The attached figures and analytical summary tables have been updated to better reflect site activities to date. On 8/29/23, three samples (DL-B04@3', AST-B01@3", AST-B03@3") were collected from soil above the tank liner, as illustrated on Figure 1. Analytical results received on 8/30/23 indicated that sample DL-B04@3' contained organic and inorganic concentrations exceeding Table 915-1 standards. This historically impacted soil was reported on 8/30/23. Between 8/30/23 and 9/1/23, the tank liner was removed, and excavation activities began in the area beneath the former tank liner to remove impacted soil in the area of DL-B04@3', as illustrated on Figure 2. Between 9/1/23 and 9/20/23, additional excavation activities were conducted (beneath former liner), and on 9/20/23, confirmation soil samples collected from the final excavation extent, as illustrated on Figure 3. Documentation of the integrity of the liner is not being provided because excavation activities were conducted beneath the liner, and KMOG is not stating that the historical release was contained within the secondary liner.

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: 04/16/2025

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: Grace Rollins

Date: 11/03/2025

Remediation Project Number: 29958

COA Type**Description**

	A more recent form, Document # 404364991, has been submitted. The COAs/comments on that form take precedence.
1 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**

404083091	FORM 27-SUPPLEMENTAL-SUBMITTED
404083238	PHOTO DOCUMENTATION
404083253	ANALYTICAL DATA SUMMARY TABLE(S)
404167110	SOIL SAMPLE LOCATION MAP
404167119	SOIL SAMPLE LOCATION MAP
404167120	SOIL SAMPLE LOCATION MAP
404167121	SOIL SAMPLE LOCATION MAP
404167130	LABORATORY ANALYTICAL REPORT

Total Attach: 8 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)