

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 &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers Phone: <u>(720) 929-4307</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>Max Moran</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 660' NW  
Wetlands: approximately 880' NW  
Spring: none  
Livestock: none  
Occupied Building: none  
High Priority Habitats: within a 1/4 mile of Mule Deer Migration Corridor area

## **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
No	GROUNDWATER	Groundwater not encountered	Groundwater samples/laboratory analytical results
Yes	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.

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 decommissioning 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', PW-S01@3', PW-W01@3') were submitted for laboratory analysis of BTEX, naph., TMBs, TPH, boron, pH, SAR, and EC, as approved on the Form 27-Initial (Document # 403436002), to determine if a release occurred. Soil sample DL-B04@3' (waste characterization sample) was submitted for laboratory analysis of the full ECMC Table 915-1 analytical suite. 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/or background limits. As such, a Form 19 Initial/Supplemental Spill/Release Report (ECMC Document # 403516295) was submitted on August 31, 2023 and the ECMC issued Spill/Release Point ID 485091. Soil sample location data are presented in Table 1. Soil analytical results are summarized in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figure 1. The applicable secured laboratory analytical reports are attached. The field notes and photographic log are attached.

## 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 waste characterization results, the soil samples were submitted for analysis of benzene, ethylbenzene, total xylenes, TPH, naph., 1,2-methyl., benzo(a)anth., chrysene, pH, As, Ba, and Se. As requested by the ECMC on denied Doc. #403865250, additional confirmation samples were collected from the base and sidewalls of the final excavation extent and analyzed for the remaining Table 915-1 analytes to confirm Table 915-1 compliance. Analytical results indicated that the naph. concentration in PW-B04-01 @6' exceeded the ECMC Table 915-1 standard. Additional assessment and/or excavation activities are ongoing.

### Proposed Groundwater Sampling

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

Groundwater was not encountered during decommissioning or subsequent over-excavation activities. If groundwater is encountered during remaining assessment activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for all analytes listed in ECMC Table 915-1 Organic Compounds in Groundwater and Groundwater Inorganic Parameters using standard methods appropriate for detecting the target analytes in ECMC Table 915-1.

### 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 53

Number of soil samples exceeding 915-1 30

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

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-PW-BG06 and BG07-BG12 were collected from non-impacted native material (Valent sand, sand) adjacent to the produced water vessel excavation at depths ranging from approximately 0.25'-10' bgs. 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 the same plot of land have been included, as presented on the pending Form 27-Supplemental Document #404083091. 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 soil sample locations are illustrated on Figure 2.

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 assessment and/or excavation activities to address the remaining naphthalene exceedance in PW-B04-01@6' are ongoing and will be summarized in a forthcoming Form 27-Supplemental update.

## 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. Additional assessment and/or excavation activities to address the remaining naphthalene exceedance in PW-B04-01@6' are ongoing and will be summarized in a forthcoming Form 27-Supplemental update. If required, soil will be removed and transported to a licensed disposal facility.

### 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.

Additional assessment and/or excavation activities to address the remaining naphthalene exceedance in PW-B04-01 @6' are ongoing and will be summarized in a forthcoming Form 27-Supplemental update.

### **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? \_\_\_\_\_

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. 03/31/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/29/2023

Proposed date of completion of Remediation. 03/31/2026

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**

The two previous Form 27-Supplementals (Document #404083091, submitted 4/16/25, and Document #404245236, submitted 7/10/25) are still in process with the ECMC.

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

Signed: Max Moran

Title: Environmental Advisor

Submit Date: 10/08/2025

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**

	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.
	Per the COA on Form 27 Document # 404016258 (Remediation Project # 29956): "Analytical data from soil samples collected from the WH-BG03 background sample location do not appear to be representative of background conditions near the spill/release"  These samples shall be omitted from future background determination calculations.
2 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**

404364991	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404365139	SOIL SAMPLE LOCATION MAP
404371494	LABORATORY ANALYTICAL REPORT
404371496	LABORATORY ANALYTICAL REPORT
404377003	SOIL SAMPLE LOCATION MAP
404377005	LOGS
404377006	PHOTO DOCUMENTATION
404377007	ANALYTICAL DATA SUMMARY TABLE(S)
404420785	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)