

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404470987
Receive Date:
12/18/2025

Report taken by:
Alexander Ahmadian

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) 929-4307 Mobile: ()
Address: P O BOX 173779		
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Max Moran	Email: DJRemediation_Forms@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16127 Initial Form 27 Document #: 402535560

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: LOCATION	Facility ID: 318890	API #: _____	County Name: WELD
Facility Name: ELLANORA M ACKERSON GAS UNIT-61N67W 2SWE		Latitude: 40.075906	Longitude: -104.853925
		** correct Lat/Long if needed: Latitude: 40.075374	Longitude: -104.854371
QtrQtr: SWSE	Sec: 2	Twp: 1N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 479714	API #: _____	County Name: WELD
Facility Name: Ackerson Ellanora M GU 2		Latitude: 40.075374	Longitude: -104.854371
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SWSE	Sec: 2	Twp: 1N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Agriculture

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

Brantner Ditch located approximately 40 feet (ft) west; Water wells approximately 650 ft northwest and 1,000 ft north-northeast; Occupied buildings located approximately 700 ft northwest; Agriculture approximately 275 ft north; Groundwater at approximately 2 ft below ground surface (bgs).

DENIED

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
Yes	GROUNDWATER	TBD	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	Previously Reported	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 at the Ackerson Ellanora M GU 2 Facility were completed on March 19 and April 8, 2021. Groundwater was encountered during excavation activities. Visual inspection and field screening of soils at one aboveground storage tank (AST), one produced water vessel (PWV), one meter house, one separator, and potholes were conducted following removal activities. Soil samples AST01@5', PWV-E01`@2.5', PWV-B01@4', Flowline01@4', and Flowline02@4' were submitted for laboratory analysis of full list Table 915-1 constituents including benzene, toluene, ethylbenzene, xylenes (BTEX), 1,2,4- and 1,3,5-trimethylbenzenes (TMBs), naphthalene, total petroleum hydrocarbons (TPH)-gasoline range organics (GRO), TPH diesel range organics (DRO), and TPH-oil range organics (ORO), Table 915-1 polycyclic aromatic hydrocarbons (PAHs), pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron and Table 915-1 metals to determine if a release occurred. Laboratory analytical results for AST03@6'-WP, AST04@6'-WP, PH08@6'-WP, PWV01-S01@2'-WP, SEP01-Inlet@6"-WP and SEP02-Inlet@6"-WP indicated that TPH, TMBs, naphthalene, benzo (a)anthracene, 1-methylnaphthalene, 2-methylnaphthalene, arsenic, barium, cadmium, and selenium impacts exceeding ECMC Table 915-1 allowable levels were present at the former facility. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 402644557) was submitted on April 1, 2021 and the ECMC issued Spill/Release Point ID 479714.

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 April 7, 2021 and March 22, 2022, excavation activities were conducted to address remaining soil impacts at the former facility location and confirmation soil samples were collected from the base and sidewalls of the final extents of the excavations at depths ranging from 5 ft bgs to 15 ft bgs. The confirmation soil samples were submitted for laboratory analysis of the approved site-specific waste profile developed at the time of excavation, including BTEX, TMBs, TPH, PAHs, EC, SAR, pH, boron, and/or select Table 915-1 metals using ECMC-approved methods. Analytical results indicated that constituent concentrations in the soil samples collected from the final excavation extent were in compliance with the ECMC Table 915-1 standards or within 1.25 times background levels for Table 915-1 metals.

Proposed Groundwater Sampling

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

On April 7 and April 8, 2021, groundwater samples were collected from the AST, PWV, and separator excavations and submitted for Table 915-1 analyses. One background groundwater sample was also collected and submitted for Table 915-1 inorganic parameters. Based on the laboratory analytical results, groundwater samples PWV-GW01 and Separator-GW01 exceeded the ECMC Table 915-1 allowable levels for benzene, 1,2,4-trimethylbenzene, chloride ion, and/or sulfate ion.

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 March 19, 2021, visual inspections and field screening of soils were conducted at three sidewall locations within the PWV excavation and four potholes at the facility. 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.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 125

Number of soil samples exceeding 915-1 87

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

Approximate areal extent (square feet) 7700

NA / ND

-- Highest concentration of TPH (mg/kg) 2071.7

-- Highest concentration of SAR 9.94

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 17

Groundwater

Number of groundwater samples collected 39

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 2

Number of groundwater monitoring wells installed 18

Number of groundwater samples exceeding 915-1 3

-- Highest concentration of Benzene (µg/l) 142

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 38.5

-- Highest concentration of Xylene (µg/l) 304

NA 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?

Two background soil samples (Native-BG03@8' and Native-BG04@12') were collected from the native material outside of the facility excavation. Four background soil samples (BGE, BGN, BGS, BG01@8') were collected from the native material outside of the Ackerson Ellanora M GU 2 wellhead excavation (Remediation No. 16278). Background soil samples were submitted for laboratory analysis of EC, SAR, pH, boron, and/or 915-1 metals. Laboratory analytical results indicated pH, SAR, boron, arsenic, barium, and selenium are naturally high in the native soil.

One background groundwater sample (GWBG01) was also collected and submitted for Table 915-1 inorganic parameters.

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?

Groundwater monitoring wells (MW01 through MW18) were installed to delineate the dissolved-phase impacts. Per the conditions of approval (COAs) issued by the ECOM on July 12, 2024 to the Form 27 Supplemental dated April 4, 2024 (Document No. 403526279), a minimum of one soil sample was collected from each soil boring advanced outside of excavation backfill material during monitoring well installation. The soil samples were submitted for laboratory analysis of full list Table 915-1 constituents. Soil samples were collected from the interval exhibiting the highest degree of impacts in the unsaturated zone or, in the absence of apparent impacts, from directly above the water table. Laboratory analytical results indicate that organic exceedances are present at SB02, SB16, and SB17 and inorganic exceedances are present at SB04. Due to the anomalous values for EC and SAR at SB04 and the lack of organic exceedances, a verification sample will be collected to confirm the initial inorganic results. Additional monitoring wells will be installed to delineate the organic soil impacts identified at MW02, MW16, and MW17. Due to the location of the Brantner Ditch directly upgradient from MW16 and MW17, discussions are underway to determine where access for additional upgradient well installation is possible. The proposed locations of the additional monitoring wells will be submitted in a subsequent Form 27 Supplemental report following additional evaluation.

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.

Approximately 700 CY of impacted soil was transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling. Approximately 10,844 CY of impacted soil was transported to the Front Range Landfill in Erie, Colorado for disposal. Approximately 320 CY of impacted soil was transported to the Buffalo Ridge Landfill in Keenesburg, Colorado for disposal. Approximately 20,087 barrels of petroleum hydrocarbon impacted groundwater were removed from the excavation and taken to the Kerr-McGee Aggregate Recycling Facility in Weld County, Colorado. Disposal records are kept on file and are available upon request. The excavation areas were 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 impacted soil in the excavation areas has been removed and all remaining soil at the extent of the excavations is in compliance with the ECMC Table 915-1 standards or within 1.25 times background levels for Table 915-1 metals.

Groundwater monitoring wells (MW01 through MW18) were installed to delineate the dissolved-phase impacts. Per the conditions of approval (COAs) issued by the ECMC on July 12, 2024 to the Form 27 Supplemental dated April 4, 2024 (Document No. 403526279), a minimum of one soil sample was collected from each soil boring advanced outside of excavation backfill material during monitoring well installation. The soil samples were submitted for laboratory analysis of full list Table 915-1 constituents. Soil samples were collected from the interval exhibiting the highest degree of impacts in the unsaturated zone or, in the absence of apparent impacts, from directly above the water table. Laboratory analytical results indicate that organic exceedances are present at SB02, SB16, and SB17 and inorganic exceedances are present at SB04. Due to the anomalous values for EC and SAR at SB04 and the lack of organic exceedances, a verification sample will be collected to confirm the initial inorganic results. Additional monitoring wells will be installed to delineate the organic soil impacts identified at MW02, MW16, and MW17. Due to the location of the Brantner Ditch directly upgradient from MW16 and MW17, discussions are underway to determine where access for additional upgradient well installation is possible. The proposed locations of the additional monitoring wells will be submitted in a subsequent Form 27 Supplemental report following additional evaluation.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)	Yes	Excavate and offsite disposal
_____ Chemical oxidation		If Yes: Estimated Volume (Cubic Yards) _____ 11864
_____ Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or ECMC Facility ID # _____ 149007
_____ Natural Attenuation	No	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.

Groundwater monitoring of wells MW01 through MW18 is conducted quarterly for full list Table 915-1 constituents in groundwater. Due to a tracking error, a groundwater monitoring event was not conducted during the first quarter of 2025 and quarterly monitoring resumed in the second quarter of 2025. Upgradient and compliant monitoring well MW09 was chosen as the local background for determining the Table 915-1 allowable levels for inorganic constituents. Third quarter 2025 laboratory analytical results indicate that groundwater is in compliance with the Table 915-1 allowable levels or background levels for Table 915-1 inorganic constituents.

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: \$ 20000 _____

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 700 CY of impacted soil were transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards _____ 11864

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable: _____ 149007

Non-ECMC Disposal Facility: Front Range Landfill in Erie, CO (10844 CY) and Buffalo Ridge Landfill in Keenesburg, CO (320 CY)

Volume of E&P Waste (liquid) in barrels _____ 20087

E&P waste (liquid) description Impacted Water

ECMC Disposal Facility ID #, if applicable: _____ 434766

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? No

Does the previous reply indicate consideration of background concentrations? _____

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. 03/29/2021

Actual Spill or Release date, or date of discovery. 03/29/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/19/2021

Proposed site investigation commencement. 03/19/2021

Proposed completion of site investigation. 06/12/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/19/2021

Proposed date of completion of Remediation. 06/12/2027

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

No additional work has been done since the previous Form 27 submitted on 9/19/2025 (Document No. 404352450). The fourth quarter 2025 groundwater monitoring event will be conducted in December 2025 and laboratory analytical results will be summarized in a subsequent Form 27 Supplemental report. The implementation schedule has been updated.

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: 12/18/2025

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: 16127

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**

404470987	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

Environmental	<p>ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location.</p> <p>Per Rule 912.a.(1-2): Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and may request expedited review if necessary.</p> <p>Operator shall conduct work in compliance with approved workplans and the 900 Series Rules. Operator shall provide a replacement form documenting investigation and clean up of these impacts; if a form providing this information is in process no replacement Form is due. If Operator is requesting a schedule change under Rule 913.d.(2) Operator shall attach adequate justification for the request. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.</p>	12/19/2025
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Total: 1 comment(s)