

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 Phone: (832) 814-7792 Mobile: ()
Address: P O BOX 173779		
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Ariana Ochoa	Email: DJRemediation_Forms@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36722 Initial Form 27 Document #: 403851072

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: 446179 API #: _____ County Name: WELD
 Facility Name: BEDDO 3-25/BED D O6-25 O SA Latitude: 40.202100 Longitude: -104.834469
 34003469
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: NWNE Sec: 25 Twp: 3N Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 488232 API #: _____ County Name: WELD
 Facility Name: Beddo 2-25/Beddo 7-25 Latitude: 40.201864 Longitude: -104.834700
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: NWNE Sec: 25 Twp: 3N Range: 67W 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? 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

The nearest domestic water well is located approximately 70 feet northeast of the facility.

Surface water is located approximately 100 feet east of the facility.

An area with wetland characteristics is located approximately 240 feet east of the facility

The production facility is located within a Bald Eagle Active Nest Site Half Mile, Aquatic Native Species Conservation Waters, Mule Deer Migration Corridor, Mule Deer Severe Winter Range, and Mule Deer Winter Concentration Area designated high priority habitat buffers.

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
No	GROUNDWATER	Impacts not encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	Impacts encountered	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 conducted at the Beddo 2-25/Beddo 7-25 production facility location on September 24 and 25, 2024. Visual inspection and field screening of soils was conducted following facility decommissioning activities, and ten (10) confirmation soil samples were collected from the former separator (SEP), above-ground storage tank (AST), and partially buried produced water vessel (PWV) locations, and submitted for laboratory analysis of the full Table 915-1 analytical suite to determine if a release occurred. Laboratory analytical results indicated that soil impacts were present at sample locations SEP1-B01 @3', SEP2-B01 @3', PW1-B01 @4', and PW2-W01 @2' due to benzo(a)anthracene (B(a)a), and sample location PW2-B01 @4' due to B(a)a, and total petroleum hydrocarbons (TPH) concentrations exceeding the ECMC Table 915-1 soil standards. As such, a Form 19-Initial/Supplemental Spill/Release Report (Document No. 403937177) was submitted on September 27, 2024, and the ECMC issued Spill/Release Point ID 488232. Analytical results indicated that constituent concentrations in the remaining confirmation soil samples were in compliance with ECMC Table 915-1 standards and/or site specific background levels (x 1.25 for metals).

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 November 4, 2024, excavation activities were completed to address the remaining impacted soil at the facility. Eighteen (18) confirmation soil samples were collected from the excavation areas at the SEP and PWV locations and submitted for TPH, PAHs, metals, pH, SAR, EC, and boron analysis based on waste characterization laboratory analytical results from samples collected from the SEP and PWV areas during decommissioning. Laboratory analytical results indicated that impacted soil remains in the PWV excavation area due to B(a)a, As, and Ag concentrations in sample location PW1-E03@4' and B(a)a concentration in sample location PW2-W03@3' exceeding Table 915-1 standards and/or site-specific background levels (x 1.25 for metals). Soil samples collected from the SEP excavation were in compliance with 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 encountered in the PWV excavation area at approximately 4.5-feet below ground surface (bgs). On September 25, 2024, two (2) groundwater samples were collected from the PWV excavation areas and submitted for laboratory analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-TMB by USEPA Method 8260D as well as total dissolved solids (TDS), chloride, and sulfate. Analytical results indicated that constituent concentrations in the groundwater samples were in compliance with ECMC Table 915-1 standards and site-specific background levels for inorganics.

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 September 24 and 25, 2024, visual inspection and field screening of soils was conducted at six (6) sidewall locations within the PWV removal excavations, one (1) location at the former enclosed combustion device (ECD), one (1) location at the former meter house (MH), and two (2) locations at the former ASTs. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the soil screening locations, and 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 28

Number of soil samples exceeding 915-1 10

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

Approximate areal extent (square feet) 1720

NA / ND

-- Highest concentration of TPH (mg/kg) 1182.54

-- Highest concentration of SAR 3.16

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 2

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 4

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____

ND Highest concentration of Toluene (µg/l) _____

ND Highest concentration of Ethylbenzene (µg/l) _____

ND Highest concentration of Xylene (µg/l) _____

NA Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected

0 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?

Eighteen (18) background soil samples were collected from undisturbed native material adjacent to the nearby former HSR-Beddo 2, 7-25 wellhead locations, located approximately 440 feet southwest of the facility, from similar depths, the same NRCS soil type (Aquolls and aquents), and land use. The background soil samples were submitted for laboratory analysis of Table 915-1 metals and the Soil Suitability for Reclamation Parameters using standard ECOMC-approved methods appropriate for detecting the target analytes in Table 915-1. One (1) background groundwater sample was collected from the above-mentioned location and submitted for TDS, chloride, and sulfate.

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 excavation activities to address remaining B(a)a, As, and Ag concentrations in soil at the PWV excavation locations have been on hold due to the half-mile bald eagle nesting stipulations and will resume after August 1, 2026, and will be summarized in a forthcoming Form-27 Supplemental.

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.

On October 3 and November 4, 2024, approximately 630 cubic yards of impacted material were excavated from the PWV and SEP excavation areas and were transported to the Front Range Landfill in Erie, Colorado, for disposal. Additionally, approximately 150 barrels of groundwater were removed from the excavation areas, for sidewall stability and backfill management purposes, and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado for recycling.

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.

Analytical results indicated that impacted soil remains in the PWV excavation areas at sample locations PW1-E03@4' and PW2-W03@4' as described herein. Additional excavation activities to address remaining B(a)a, As, and Ag concentrations in soil have been on hold due to the half-mile bald eagle nesting stipulations and will resume after August 1, 2026, and will be summarized in a forthcoming Form-27 Supplemental.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 630

_____ 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 No New Work

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: \$ 18500

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 150 barrels of groundwater were removed from the excavation areas and transported to the Kerr-McGee Aggregate Recycle Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 630

E&P waste (solid) description Impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Front Range Landfill - Erie, CO

Volume of E&P Waste (liquid) in barrels 150

E&P waste (liquid) description Impacted groundwater

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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Following the completion of remediation and site assessment activities, the site will be 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. _____

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. 02/06/2024

Actual Spill or Release date, or date of discovery. 09/27/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/24/2024

Proposed site investigation commencement. 09/24/2024

Proposed completion of site investigation. 11/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/24/2025

Proposed date of completion of Remediation. 11/30/2026

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

KMOG has a large number of active remediation projects that fall within High Priority Habitats (HPH), which limits when field work can be completed on these projects. This project falls within the half-mile Bald Eagle Nesting Buffer, and field work can only be conducted between 8/1 and 11/30 each year. Due to this timing restriction, no field work has been completed on this project since the previous Form 27 Submittal. Field work is anticipated to resume during the 2026 open timing window.

No additional site assessment activities have been conducted since a previous Form 27 Supplemental-update was submitted. Excavation and associated site assessment activities at this location are pending. Excavation and additional site assessment activities will be summarized in a forthcoming Form 27-Supplemental update.

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: 12/22/2025

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: 36722

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

404472932	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>	12/30/2025
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Total: 1 comment(s)