

State of Colorado  
Energy & Carbon Management Commission

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404479169  
Receive Date:  
01/06/2026  
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: 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 #: 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: LOCATION	Facility ID: 318687	API #: _____	County Name: WELD
Facility Name: DECHANT 27-12	Latitude: 40.154760	Longitude: -104.604150	
** correct Lat/Long if needed: Latitude: 40.154379		Longitude: -104.603296	
QtrQtr: SENE	Sec: 12	Twp: 2N	Range: 65W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 485091	API #: _____	County Name: WELD
Facility Name: Dechant 1-12, 17-12 O SA	Latitude: 40.154379	Longitude: -104.603296	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 12	Twp: 2N	Range: 65W Meridian: 6 Sensitive Area? Yes

## 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

**DENIED**

# 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.

## 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 approved in 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.

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.

### REMEDATION 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 )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

- Yes \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 350
- \_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_
- \_\_\_\_\_ Excavate and onsite remediation
- \_\_\_\_\_ 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 & 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: \$ 7500 \_\_\_\_\_

## 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:

N/A

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 350

E&P waste (solid) description \_\_\_\_\_ Impacted soil

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: \_\_\_\_\_ Buffalo Ridge Landfill located in Keenesburg, Colorado

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 0

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 reseeded 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. 06/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/29/2023

Proposed date of completion of Remediation. 06/30/2026

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**

In response to the COA on the previous Form 27-Supplemental Document #404364991, the 3Q25 Form 27-Supplemental (Document #404245236) was submitted on 7/10/25, then denied on 10/27/25. The 4Q25 Form 27-Supplemental (Document #404364991) was submitted 10/08/25, 90 days after the 3Q25 Form-27 Supplemental submittal.

KMOG has a large number of active remediation projects and is working diligently to bring each project to closure. These projects are prioritized based on potential environmental risk; considering factors such as size of impact, type of impact, what media is impacted, proximity to sensitive receptors and land use. Due to this prioritization, no field work has been completed on this project since the previous Form 27 submittal. Field work is anticipated to resume on the project by April 30, 2026.

Per the COA in the approved Form 27-Supplemental Document #404364991, the off-location background soil sample WH-BG03 will be omitted from future background determination calculations.

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: 01/06/2026

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: 29958

**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**

404479169	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
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>	01/07/2026

Total: 1 comment(s)