

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404470626
Receive Date:
01/14/2026

Report taken by:
Candice (Nikki) Graber

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25902 Initial Form 27 Document #: 403216888

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>TANK BATTERY</u>	Facility ID: <u>482241</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Briggs 1-32 Tank Battery</u>	Latitude: <u>40.257040</u>	Longitude: <u>-104.835700</u>	
	** correct Lat/Long if needed: Latitude: <u>40.256834</u>	Longitude: <u>-104.835566</u>	
QtrQtr: <u>SWNE</u> Sec: <u>1</u> Twp: <u>3N</u> Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>			

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>483792</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UP 41 PA I 1 / Briggs O SA Historic</u>	Latitude: <u>40.257103</u>	Longitude: <u>-104.835767</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>SWNE</u> Sec: <u>1</u> Twp: <u>3N</u> Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>			

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use 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

Multiple buildings and livestock holding pens are located within ¼ mile of the facility.
The nearest building is located approximately 1,210 feet east of the facility.
The nearest domestic water well is located approximately 1,190 feet southeast of the facility.
Surface water is located approximately 1,200 feet southwest of the facility.

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	SOILS	20' (N-S) X 20' (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.

In accordance with the remediation workplan (Rem #38129, Doc #404019399), reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of Kerr-McGee Oil and Gas Onshore, LP (KMOG). The pH results in samples SEP1-B03@3' and SEP1-B04@3' were altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples BG01@3, BG02@3, BG03@3, and BG04@3) were collected on 12/17/24. In response to comments received on Doc #404073082 prior to denial, additional soil investigation was conducted at the former SEP1-B03@3' and SEP1-B04@3' locations to assess potential impacts. Confirmation sampling was performed on 10/16/25, and samples were analyzed for full Table 915-1. During assessment activities, soil was logged to account for any overlaying backfill material and confirm the confirmation samples were collected at the same depth/elevation as the original sample. Based on field identification of native soil, the confirmation samples were collected at deeper depths relative to the current ground surface than the initial samples and were subsequently named SEP1-B03@5' and SEP1-B04@4'. Results indicated samples were in compliance with allowable levels or background x1.25 for metals. Based on analytical and soil screening data provided herein, assessment is complete and KMOG is requesting a no further action (NFA) determination.

The data altered by a third-party without the knowledge of and beyond the reasonable control of KMOG can be found in Form 27 Document No. 403383440. The original unaltered lab report and the reassessment analytical results are attached. The original sample results and the sample results are provided in Tables 1 through 5. A topographic Site Location Map is provided as Figure 1. The reassessment sample locations are provided on Figures 2 and 4.

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):

In response to comments received on Doc #404073082 prior to denial, additional soil investigation was conducted at the former SEP1-B03@3' and SEP1-B04@3' locations to assess potential impacts. Confirmation sampling was performed on 10/16/25, and samples were analyzed for full Table 915-1. During assessment activities, soil was logged to account for any overlaying backfill material and confirm the confirmation samples were collected at the same depth/elevation as the original sample. Based on field identification of native soil, the confirmation samples were collected at deeper depths relative to the current ground surface than the initial samples and were subsequently named SEP1-B03@5' and SEP1-B04@4'. Results indicated samples were in compliance with allowable levels or background x1.25 for metals.

Proposed Groundwater Sampling

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

Groundwater was not encountered during facility decommissioning or subsequent over-excavation or reassessment 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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 21
Number of soil samples exceeding 915-1 8
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 400

NA / ND

-- Highest concentration of TPH (mg/kg) 2.28
-- Highest concentration of SAR 9.56
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? Yes
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?

Eleven (11) background soil samples were collected from native material adjacent to the former production facility. The background soil samples were submitted for laboratory analysis of electrical conductivity (EC), sodium adsorption ratio (SAR), pH, boron, and Table 915-1 metals, using standard EC/MC-approved methods. Laboratory analytical results indicate that levels of arsenic, barium, cadmium, lead, and selenium are naturally high in the native soil. Analytical results for the background soil samples are presented in Tables 4 and 5.

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?

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 10 cubic yards of impacted soil were removed from the site and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling. Approximately 70 cubic yards of impacted soil were removed from the site and transported to the Front Range Landfill in Erie, Colorado for disposal. Disposal records are kept on file and are available upon request. The excavation areas were 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.

In accordance with the remediation workplan (Rem #38129, Doc #404019399), reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of Kerr-McGee Oil and Gas Onshore, LP (KMOG). The pH results in samples SEP1-B03@3' and SEP1-B04@3' were altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples BG01@3, BG02@3, BG03@3, and BG04@3) were collected on 12/17/24. In response to comments received on Doc #404073082 prior to denial, additional soil investigation was conducted at the former SEP1-B03@3' and SEP1-B04@3' locations to assess potential impacts. Confirmation sampling was performed on 10/16/25, and samples were analyzed for full Table 915-1. During assessment activities, soil was logged to account for any overlying backfill material and confirm the confirmation samples were collected at the same depth/elevation as the original sample. Based on field identification of native soil, the confirmation samples were collected at deeper depths relative to the current ground surface than the initial samples and were subsequently named SEP1-B03@5' and SEP1-B04@4'. Results indicated samples were in compliance with allowable levels or background x1.25 for metals. Based on analytical and soil screening data provided herein, assessment is complete and KMOG is requesting an NFA determination.

The analytical data altered by a third-party without the knowledge of and beyond the reasonable control of KMOG can be found in Form 27 Document No. 403383440. The original unaltered lab report and the reassessment analytical results are attached. The original sample results and the sample results are provided in Tables 1 through 5. A topographic Site Location Map is provided as Figure 1. The reassessment sample locations are provided on Figures 2 and 4.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	Yes _____ Excavate and offsite disposal
_____ Chemical oxidation	If Yes: Estimated Volume (Cubic Yards) _____ 80
_____ 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.

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 NFA Status Request

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 Colorado 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: \$ 0

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 10 cubic yards of impacted soil were removed from the site and transported to the Kerr-McGee Land Treatment Facility in Weld County, Colorado for recycling

Volume of E&P Waste (solid) in cubic yards 80

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable: 149007

Non-ECMC Disposal Facility: Front Range Landfill in Erie, CO (70 CY)

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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. 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. 12/18/2025

Proposed date of completion of Reclamation. 12/18/2026

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. 01/31/2023

Actual Spill or Release date, or date of discovery. 01/31/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/26/2023

Proposed site investigation commencement. 01/26/2023

Proposed completion of site investigation. 10/16/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/26/2023

Proposed date of completion of Remediation. 10/16/2025

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 accordance with the remediation workplan (Rem #38129, Doc #404019399), reassessment activities were conducted in response to the submittal of analytical data that was altered by a third-party contractor without the knowledge and beyond the reasonable control of KMOG. The pH results in samples SEP1-B03@3' and SEP1-B04@3' were altered by a third-party from 8.63 to 7.63 and 8.48 to 7.48 respectively. In response, two verification samples (SEP1-B03RS@3 and SEP1-B04RS@3) and four background samples BG01@3, BG02@3, BG03@3, and BG04@3) were collected on December 17, 2024. In response to comments received on Form 27 Document No. 404073082 prior to denial, additional soil investigation was conducted at the former SEP1-B03@3' and SEP1-B04@3' locations to assess potential impacts. Confirmation sampling was performed on October 16, 2025, and samples were analyzed for full Table 915-1. During assessment activities, soil was logged to account for any overlying backfill material and confirm the confirmation samples were collected at the same depth/elevation as the original sample. Based on field identification of native soil, the confirmation samples were collected at deeper depths relative to the current ground surface than the initial samples and were subsequently named SEP1-B03@5' and SEP1-B04@4'. Laboratory analytical results indicated that samples were in compliance with Table 915-1 allowable levels or background levels x1.25 for Table 915-1 metals. Based on analytical and soil screening data provided herein, assessment is complete and KMOG is requesting an NFA determination for this location.

The lab report (Lab ID Y302302) altered by a third-party without the knowledge of and beyond the reasonable control of KMOG was originally submitted to the ECMC as Attachment Document No. 403384190. An original locked version of lab report Y302302 is attached to this form as a replacement.

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: 01/14/2026

Email: Erik_Mickelson@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: Candice (Nikki) Graber

Date: 01/15/2026

Remediation Project Number: 25902

COA Type

Description

	ECMC Staff accepts the information as provided in this form. By reviewing this form, ECMC Staff does not determine fault for any alleged wrongful actions. As provided by Rule 201.b., Operators must ensure compliance with ECMC Rules by all consultants, contractors, and subcontractors.
	Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required. The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.

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

404470626	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
404479500	SOIL SAMPLE LOCATION MAP
404479506	ANALYTICAL DATA SUMMARY TABLE(S)
404479508	ANALYTICAL DATA SUMMARY TABLE(S)
404479515	PHOTO DOCUMENTATION
404479518	LABORATORY ANALYTICAL REPORT
404479519	LABORATORY ANALYTICAL REPORT
404479520	LABORATORY ANALYTICAL REPORT
404479522	LABORATORY ANALYTICAL REPORT
404479523	LABORATORY ANALYTICAL REPORT
404479530	SOIL SAMPLE LOCATION MAP

404479534	SITE MAP
404479537	SOIL SAMPLE LOCATION MAP
404480910	SOIL SAMPLE LOCATION MAP
404502739	ANALYTICAL DATA SUMMARY TABLE(S)
404507140	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 16 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)