

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Kari Brown

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
Address: P O BOX 173779		Phone: (720) 929-4307
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Max Moran	Email: DJRemediation_Forms@oxy.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37543 Initial Form 27 Document #: 403902186

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: TANK BATTERY	Facility ID: 446892	API #: _____	County Name: WELD
Facility Name: WINDELL1-13&4&5-18 O SA 34003778	Latitude: 40.144889	Longitude: -104.828946	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 18	Twp: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 488932	API #: _____	County Name: WELD
Facility Name: Windell1-13&4&5-18 Facility	Latitude: 40.144879	Longitude: -104.828845	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 18	Twp: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use South Platte River

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

South Platte River 100 feet (ft) east. Water well 170 ft southwest. County Road 230 ft west. Areas with wetland characteristics are surrounding the facility. Mining ponds 500 ft south and 1160 ft southwest. Irrigation ditch 850 ft west. Agriculture. The site is located within a Bald Eagle Active Nest Site Half Mile, Bald Eagle Roost Site, Mule Deer Migration Corridor, Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, and Aquatic Native Species Conservation Waters High Priority Habitat (HPH) areas.

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
UNDETERMINED	GROUNDWATER	TBD	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	TBD	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 Windell1-13&4&5-18 facility on November 12, 2024. Visual inspection and field screening of soil at one aboveground storage tank (AST), one produced water vessel (PWV), one separator, one dumphine pothole, one scrub pot, two emission control devices (ECDs), and one meter house location were conducted following removal activities. Soil samples (AST01@0.5', PWV-W01@2', PWV-B01@4', SEP01-INLET@3', and SEP01-OUTLET@3') were submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. Initial laboratory analytical results indicated that benzo(a)anthracene or cadmium impacts exceeding the ECMC Table 915-1 allowable levels and/or background level are present at the PWV-W01 and SEP01-OUTLET locations, respectively. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 404041074) was submitted on December 27, 2024, and the ECMC issued Spill/Release Point ID 488932. A verification sample was collected at the SEP01-OUTLET location to confirm the initial inorganic results. Final analytical results were within the ECMC Table 915-1 allowable level for cadmium. All other soil samples were within the ECMC Table 915-1 allowable levels or within background levels x1.25 for Table 915-1 metals.

Additional excavation activities are pending until after August 1, 2026, due to this location being located within a High Priority Bald Eagle Active Nest Site 1/2 Mile HPH Buffer. Future activities will be summarized in a subsequent Form 27 Supplemental report.

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 November 12, 2024, five confirmation soil samples (AST01, PWV-W01, PWV-B01, SEP01-INLET and SEP01-OUTLET) were collected at depths ranging from 0.5 to 4 ft below ground surface (bgs) above and below the liner. The soil samples were submitted for laboratory analysis of full list Table 915-1 constituents using ECMC-approved methods. Initial laboratory analytical results indicated that benzo(a)anthracene or cadmium impacts exceeding the ECMC Table 915-1 allowable levels and/or background level are present at the PWV-W01 and SEP01-OUTLET locations, respectively. A verification sample was collected at the SEP01-OUTLET location to confirm the initial inorganic results. Final analytical results were within the ECMC Table 915-1 allowable level for cadmium.

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 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):

On November 12, 2024, visual inspections and field screening of soil were conducted at the footprint and loadout of the AST, three sidewall locations within the PWV excavation, one dumphine pothole, one scrub pot location, two ECDs, and the meter house. 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 9
Number of soil samples exceeding 915-1 6
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 677

NA / ND

-- Highest concentration of TPH (mg/kg) 1.4
-- Highest concentration of SAR 2.63
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 4

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?

One tank battery background sample (TB-BG01@0.5') was collected from the soil used to construct the tank battery. Ten background soil samples were also collected as part of the Windell 5-18 wellhead cut and cap activities (Remediation No. 37055), located 1880 ft southeast, from similar depths (3' and 6'), field-verified soil type (clayey sand), and same land usage (gravel mine). Background samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ration (SAR), boron, and Table 915-1 metals using ECOMC-approved methods. Analytical results indicate that arsenic, cadmium, and lead are naturally high in the soil used to construct the tank battery and arsenic, barium, cadmium, copper, lead, and selenium are naturally high in the native soil.

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 are pending until after August 1, 2026, due to this location being located within a High Priority Bald Eagle Active Nest Site ½ Mile HPH Buffer. Future activities will be summarized in a subsequent Form 27 Supplemental report.

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.

Impacted soil from the PWV excavation will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of assessment activities. Disposal records are kept on file and available upon request. The excavation areas will be 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.

Laboratory data indicate that benzo(a)anthracene impacts exceeding the ECMC Table 915-1 allowable level are present at the PWV location. Groundwater was not encountered during facility decommissioning activities. Additional excavation activities are pending until after August 1, 2026, due to this location being located within a High Priority Bald Eagle Active Nest Site ½ Mile HPH Buffer. Future activities will be summarized in a subsequent Form 27 Supplemental report.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ 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 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: \$ 13500 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

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

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

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. 12/26/2024

Actual Spill or Release date, or date of discovery. 12/26/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/12/2024

Proposed site investigation commencement. 11/12/2024

Proposed completion of site investigation. 11/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/12/2024

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 will not conduct operations related to this form between 12/1 - 7/31 in compliance with the 0.5 mile Bald Eagle Nesting Buffer, and if facility decommissioning operations are scheduled between 11/15 - 11/30, work will be performed between 10am - 2pm, in compliance with the Bald Eagle Winter Night Roost Buffer.

Please refer to the Form 27 Document No. 404355978 submitted on 9/17/2025 for the request for the Director's Approval to establish site specific waste profile.

No additional work has been done since the previous Form 27 submitted on 9/17/2025 (Document No. 404355978). Additional assessment at this location is pending. As such, none of the previous attachments have been included with this form. The implementation schedule has been updated.

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 0.5 mile Bald Eagle Nesting HPH buffer, and field work can only be conducted between 8/1 and 11/30 each year. The projects within HPH buffers are being 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 was completed on this project during the 2025 open timing window. Field work is anticipated to resume on the project within the 2026 open timing window.

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: 12/30/2025

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: 37543

COA Type

Description

<u>COA Type</u>	<u>Description</u>
0 COA	

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

<u>Att Doc Num</u>	<u>Name</u>
404466615	FORM 27 DENIED
404509591	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC has denied this form without technical review as Operator has not provided CPW consult regarding the bald eagle buffer.	01/16/2026

Total: 1 comment(s)