

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 ECOM 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>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37427 Initial Form 27 Document #: 403944418

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>488190</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Mleynek 28-10M,U 28-15JI,10JI TB</u>	Latitude: <u>40.104388</u>	Longitude: <u>-105.005877</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>28</u>	Twp: <u>2N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>489498</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Mleynek 28-10M, U 28-15JI, 10JI</u>	Latitude: <u>40.104470</u>	Longitude: <u>-105.005940</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>28</u>	Twp: <u>2N</u>	Range: <u>68W</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

Domestic Water well: Approx. 1,077 feet northwest of the facility.
Surface water: Approx. 39 feet west of the facility.
Wetlands: Approx. 948 feet southeast of the facility.
Springs: none
Livestock: No livestock pens within 1/4 mile of facility.
Occupied Building: Approx. 1180 feet southeast of the facility.
High Priority Habitat: This facility is not located within a High Priority Habitat.

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
UNDETERMINED	GROUNDWATER	TBD	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 Mleynek 28-10M, U, 28-15JI, 10JI Facility on February 19, 2025. Groundwater was not encountered during excavation activities. Visual inspection and field screening of soils at one separator, one produced water vessel (PWV), and one above ground storage tank (AST) was conducted following removal activities and soil samples (AST-B01@3", PW-B01@5', PW-E01@2.5', SEP-B01@4', and SEP-B02@4') were submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results indicated that pH and SAR in soil sample AST-B01@3", pH, arsenic, barium, and selenium in soil samples PW-E01@2.5 and SEP-B01@4', pH, arsenic, and barium in soil sample SEP-B02@4', and 1,2,4-TMB, 1-methyl-, 2-methyl-, pH, arsenic, and selenium in soil sample PW-B01@5' exceeded ECMC Table 915-1 standards and/or site specific background limits. As such, a Form 19-Initial/Supplemental Spill/Release Report (ECMC Document No. 04119176) was submitted on March 7, 2025, and the ECMC issued Spill/Release Point ID 489498. Background soil samples (PW-BG02@3" - PW-BG04@3", PW-BG01@3' - PW-BG04@3', and PW-BG01@6' - PW-BG04@6') laboratory analytical results are pending. Analytical results and subsequent assessment activities at the facility will be summarized in a forthcoming Form 27-Supplemental. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample location and field screening data is presented in Table 1. The facility soil sample and field screening locations are illustrated on Figure 2. The laboratory analytical report is provided as Attachment A. The photographic log is provided as Attachment B.

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 February 19, 2025 soil samples were collected from the base (PW-B01@5') and sidewall (PW-E01@2.5') of the PWV excavation, the separator excavation (SEP-B01@4' and SEP-B02@4') and beneath the former AST (AST-B01@3"). The soil samples were submitted for laboratory analysis of the full ECMC Table 915-1 using standard methods appropriate for detecting the target analytes. Laboratory analytical results indicated that 1,2,4-TMB, 1-methyl-, 2-methyl-, pH, As, and Se in soil sample PW-B01@5', pH and SAR in soil sample AST-B01@3", pH, As, Ba, and Se in soil samples PW-E01@2.5 and SEP-B01@4', and pH, As, and Ba in soil sample SEP-B02@4' exceeded ECMC Table 915-1 and/or site specific background limits. Background soil samples (PW-BG02@3" - PW-BG04@3", PW-BG01@3' - PW-BG04@3', and PW-BG01@6' - PW-BG04@6') laboratory analytical results are pending. Analytical results and subsequent assessment activities at the facility will be summarized in a forthcoming Form 27-Supplemental.

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 activities. If groundwater is encountered during additional excavation and 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 (benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (1,2,4 - TMB), and 1,3,5-trimethylbenzene (1,3,5 - TMB)) and Groundwater Inorganic Parameters (total dissolved solids (TDS), chloride, and sulfate) 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 February 19, 2025, visual inspections and field screening of soils was conducted at three sidewalls of the PWV excavation and one former AST location. 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. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figure 2. The laboratory analytical report is provided as Attachment A. The photographic log is provided as Attachment B.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 915-1 5
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 440

NA / ND

-- Highest concentration of TPH (mg/kg) 199.2
-- Highest concentration of SAR 32.7
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 5

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@3" - PW-BG04@3", PW-BG01@3' - PW-BG04@3', and PW-BG01@6' - PW-BG04@6') were collected from native non-impacted material near the tank battery. The background samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters and ECMC Table 915-1 Metals using standard methods appropriate for detecting target analytes in Table 915-1. Laboratory analytical results are pending and will be summarized in a forthcoming Form 27-Supplemental.

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?

Details of the excavation and assessment activities to address the 1,2,4-TMB, 1-methyl-, and 2-methyl-, exceedances in soil sample PW-B01@5' will be provided in a forthcoming Form 27-Supplemental. Exceedances in soil samples AST-B01@3", PW-E01@2.5', SEP-B01@4', and SEP-B02@4' are pending background soil sample results. Final analytical results as well as any subsequent assessment activities will be detailed 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.

Details of the excavation and assessment activities to address the 1,2,4-TMB, 1-methyl., and 2-methyl., exceedances in soil sample PW-B01@5' will be provided in a forthcoming Form 27-Supplemental. Exceedances in soil samples AST-B01@3", PW-E01@2.5', SEP-B01@4', and SEP-B02@4' are pending background soil sample results. Final analytical results as well as any subsequent assessment activities will be detailed in a forthcoming Form 27-Supplemental.

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.

Details of the excavation and assessment activities to address the 1,2,4-TMB, 1-methyl., and 2-methyl., exceedances in soil sample PW-B01@5' will be provided in a forthcoming Form 27-Supplemental. Exceedances in soil samples AST-B01@3", PW-E01@2.5', SEP-B01@4', and SEP-B02@4' are pending background soil sample results. Final analytical results as well as any subsequent assessment activities will be detailed in a forthcoming Form 27-Supplemental.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ 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.

REMEDATION 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 Progress Report _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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 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. 08/06/2024

Actual Spill or Release date, or date of discovery. 03/06/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/19/2025

Proposed site investigation commencement. 02/19/2025

Proposed completion of site investigation. 12/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/06/2025

Proposed date of completion of Remediation. 12/31/2025

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

Per COA on previous submittal (Doc. No.404046957), all investigation soil samples were submitted for laboratory analysis of the full ECMC Table 915-1. Additional confirmation soil samples will be collected and analytical results will be presented to the Director for approval of a reduced analyte list.

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: 06/09/2025

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: Kari Brown

Date: 01/21/2026

Remediation Project Number: 37427

COA Type**Description**

COA Type	Description
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**

404128437	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404128670	SITE MAP
404128678	SOIL SAMPLE LOCATION MAP
404128681	LABORATORY ANALYTICAL REPORT
404160751	PHOTO DOCUMENTATION
404160788	ANALYTICAL DATA SUMMARY TABLE(S)
404514590	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)