

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: <u>KERR MCGEE OIL &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 173779</u>		Phone: <u>(720) 929-4307</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		Mobile: <u>( )</u>
Contact Person: <u>Maxwell Moran</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: An area with wetland characteristics 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", 1,2,4-TMB, 1-meth., and 2-meth. in soil sample PW-B01@5', and pH in soil samples PW-E01@2.5', SEP-B01@4', and SEP-B02@4' exceeded ECMC Table 915-1 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. Verification soil samples AST-B01V@3", PW-E01V@2.5', SEP-B01V@4', and SEP-B02V@4' were collected to verify the pH and/or SAR exceedances. Laboratory analytical results indicated that the pH concentration in soil sample AST-B01V@3" exceeded ECMC Table 915-1 and/or site specific background limits and that the remaining constituent concentrations in the verification soil samples were compliant with Table 915-1 and/or site specific background limits. 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 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. Laboratory analytical results indicated that pH and SAR in soil sample AST-B01@3", 1,2,4-TMB, 1-meth., and 2-meth. in soil sample PW-B01@5', and pH in soil samples PW-E01@2.5', SEP-B01@4', and SEP-B02@4' exceeded ECMC Table 915-1 and/or site specific background limits. Verification soil samples AST-B01V@3", PW-E01V@2.5', SEP-B01V@4', and SEP-B02V@4' were collected to verify the pH and/or SAR exceedances and analytical results indicated that a pH exceedance in soil sample AST-B01V@3" remained. Additional excavation and assessment activities 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 has not been encountered during decommissioning activities to date. If groundwater is encountered during additional decommissioning 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-tremethylbenzene (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 photographic log is provided as Attachment B.

**SITE INVESTIGATION REPORT**

**SAMPLE SUMMARY**

**Soil**

Number of soil samples collected 9  
 Number of soil samples exceeding 915-1 9  
 Was the areal and vertical extent of soil contamination delineated? No  
 Approximate areal extent (square feet) 135

**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-BG08@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. Background soil analytical results are presented in Tables 3 and 5. Background soil sample locations are illustrated on Figure 2.

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 and assessment activities to address the pH exceedance in soil sample AST-B01@3" and 1, 2, 4-TMB, 1-meth., and 2-meth. exceedances in soil sample PW-B01@5' 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.

Additional excavation and assessment activities to address the pH exceedance in soil sample AST-B01@3" and 1, 2, 4-TMB, 1-meth., and 2-meth. exceedances in soil sample PW-B01@5' will be summarized in a forthcoming Form 27-Supplemental.

## 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.

Additional excavation and assessment activities to address the pH exceedance in soil sample AST-B01@3" and 1, 2, 4-TMB, 1-meth., and 2-meth. exceedances in soil sample PW-B01@5' will be summarized 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.



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. 03/07/2025

### 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. 03/07/2025

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 Form 19 submittal (Doc. No. 404119176), a quarterly reporting schedule will be adhered to for this project. The Spill ID associated with this form is included and Rule 913.c(3): Remediation of Spill and Releases pursuant to Rule 912 has been selected on this form.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Maxwell Moran

Title: Environmental Advisor

Submit Date: 09/05/2025

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**

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**

404295354	FORM 27-SUPPLEMENTAL-SUBMITTED
404295532	SITE MAP
404295533	SOIL SAMPLE LOCATION MAP
404295536	PHOTO DOCUMENTATION
404295538	LABORATORY ANALYTICAL REPORT
404295540	LABORATORY ANALYTICAL REPORT
404295542	LABORATORY ANALYTICAL REPORT
404295543	LABORATORY ANALYTICAL REPORT
404310444	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 9 Files

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

Environmental	ECMC selected Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912. in addition to the current selection.	01/21/2026
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Total: 1 comment(s)