

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404492269  
Receive Date:  
01/27/2026

Report taken by:  
Taylor Robinson

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	<b>Phone Numbers</b>
Address: P O BOX 173779		Phone: (832) 814-7792
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Ariana Ochoa	Email: DJRemediation_Forms@oxy.com	Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37213 Initial Form 27 Document #: 403903434

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: 445763	API #: _____	County Name: WELD
Facility Name: NISHIMOTO-63N67W 36NWSE	Latitude: 40.179483	Longitude: -104.836558	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSE	Sec: 36	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 491249	API #: _____	County Name: WELD
Facility Name: Nishimoto 23-36/10-36	Latitude: 40.179484	Longitude: -104.836571	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSE	Sec: 36	Twp: 3N	Range: 67W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Crop Land

Is domestic water well within 1/4 mile? Yes

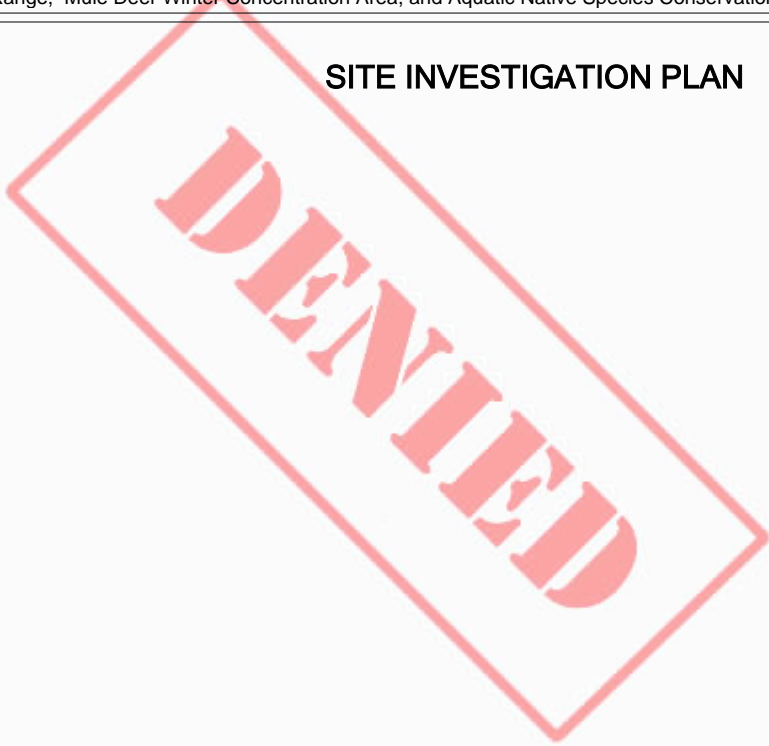
Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

**Other Potential Receptors within 1/4 mile**

Surface water: South Platte River approximately 618 feet south of the location.  
Wetlands: An area with wetland characteristics is located 618 feet south of the location.  
Water Wells: The nearest water well is located 1,275 feet west of location per GPS point.  
Springs: None.  
Occupied Building: None.  
Livestock: Livestock is located approximately 840 feet southwest of the location.  
High Priority Habitats: The location resides within a Mule Deer Migration Corridor High Priority Habitat (HPH) and is within 1/4-mile of the boundary of the Mule Deer Sever Winter Range, Mule Deer Winter Concentration Area, and Aquatic Native Species Conservation Waters HPHs.

**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	Inspection/groundwater samples/laboratory analytical results
Yes	SOILS	See attached data	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.

Facility decommissioning operations were initiated at the Nishimoto 23-36,10-36 production facility on June 2, 2025. Visual inspection and field screening of soils at the former production facility infrastructure locations were conducted following decommissioning activities, and 11 soil samples were submitted for laboratory analysis of the full Table 915-1 analytical suite to determine if a release occurred. Laboratory analytical results indicated that constituent concentrations were in compliance with Table 915-1 standards and/or site specific background levels (x 1.25 for metals), with the exception of pH in soil samples AST2-B01@3', SEP1-B01@3', and SEP2-B02@3'. Due to the absence of additional 915-1 exceedances or detections of organics in soil samples SEP1-B01@3' and SEP2-B02@3', when compared to the background, the elevated pH in these samples is considered de minimis and not an indication of a spill or release associated with E&P activities. A Form 19-Initial/Supplemental Spill/Release Report (Document No. 404302832) was submitted on August 7, 2025, and the ECMC issued Spill/Release Point ID 491249. Over-excavation at sample location AST2-B01@3" and additional site assessment activities are pending and will be summarized in a forthcoming Form 27-Supplemental update.

**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 June 2, 2025, a total of 11 confirmation soil samples were collected from the former separators (SEPs), above-ground storage tanks (ASTs), and partially buried produced water vessel (PWV) locations, at depths ranging from approximately three (3) inches to three (3) feet below ground surface (bgs). The soil samples were submitted for laboratory analysis of the full Table 915-1 analytical suite. Analytical results indicate that constituent concentrations in the final confirmation soil samples were in compliance with ECMC Table 915-1 standards and/or site-specific background levels (x 1.25 for metals), with the exception of pH in soil samples AST2-B01@3', SEP1-B01@3', and SEP2-B02@3' as described above. Impacted soil remains at sample location AST2-B01@3", over-excavation and additional site assessment activities are pending and will be summarized in a forthcoming Form 27-Supplemental update

**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 facility decommissioning activities completed to date. If groundwater is encountered during future 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 June 2, 2025, visual inspection and field screening of soils was conducted at three (3) locations below the former ASTs, three (3) sidewall locations within the PWV removal excavation, one (1) location at the former meter house (MH), two (2) dump line (DL) removal potholes, and one (1) location at the former enclosed combustion device (ECD). 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 document. The laboratory analytical reports, field notes, and a photographic log are provided as attachments.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 11  
Number of soil samples exceeding 915-1 3  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 0

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 9.37  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 0

### 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?

Twelve (12) background soil samples were collected from undisturbed native material adjacent to the former production facility, at comparable depths and soil composition to the confirmation soil samples. The background soil samples were submitted for laboratory analysis of Table 915-1 metals and the Soil Suitability for Reclamation Parameters, using standard ECMC-approved 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?

Analytical results indicated that impacted soil remains within the AST excavation area at sample location AST2-B01@3". Excavation and site assessment activities to address remaining soil impacts are pending 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.

Impacted soil will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of excavation activities. Disposal records will be kept on file and available upon request. The excavation area will be backfilled and contoured to match pre-existing conditions.

### 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.

Laboratory analytical results indicated that constituent concentrations in the 11 confirmation soil samples soil samples collected during facility decommissioning activities were in compliance with ECMC Table 915-1 standards and/or site specific background levels (x 1.25 for metals), with the exception of pH in soil samples as described herein. Over-excavation and site assessment activities to address elevated pH levels at soil sample location AST2-B01@3" are pending 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 \_\_\_\_\_

- \_\_\_\_\_ 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 No New Work

## 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: \$ 10000

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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? No

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

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. \_\_\_\_\_

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. 07/11/2024

Actual Spill or Release date, or date of discovery. 07/28/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/02/2025

Proposed site investigation commencement. 06/02/2025

Proposed completion of site investigation. 06/30/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/01/2026

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**

KMOG has a large number of active remediation projects and is working diligently to bring each project to closure. Field work for these projects is 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. This project is categorized as low environmental risk due to the absence of hydrocarbons or other organic impacts in soil. 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 June 2026.

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

Signed: Ariana Ochoa \_\_\_\_\_

Title: Sr. HSE Advisor \_\_\_\_\_

Submit Date: 01/27/2026 \_\_\_\_\_

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: 37213 \_\_\_\_\_

**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**

404492269	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

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>	01/30/2026
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Total: 1 comment(s)