

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
RICK ALLISON

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) 929-4307</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Max Moran</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32949 Initial Form 27 Document #: 403577800

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>LOCATION</u>	Facility ID: <u>306064</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>KODAK-66N67W 34SWNE</u>	Latitude: <u>40.446550</u>	Longitude: <u>-104.875470</u>	
** correct Lat/Long if needed: Latitude: <u>40.446479</u>		Longitude: <u>-104.875034</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>34</u>	Twp: <u>6N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488454</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Kodak Oil 34-13,14, 42 Facility</u>	Latitude: <u>40.446428</u>	Longitude: <u>-104.875068</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>34</u>	Twp: <u>6N</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

The nearest domestic water well is located approximately 380 feet to the northeast of the facility.
Surface water is located approximately 60 feet to the east of the facility.
A wetland is located approximately 1220 feet southeast of the facility.
The facility is located within a designated Bald Eagle Nest HPH, half mile buffer.

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
Yes	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 Kodak Oil 34-13, 14, 42 Production Facility from October 18 - 25, 2024. Groundwater was encountered in the PWV excavation at approximately 7' bgs. Visual inspection and field screening of soils at two separators, two produced water vessels (PWV), four aboveground storage tanks (AST), one meter house, one emissions control device (ECD), and three dump line potholes was conducted following removal activities and soil samples (AST-B05@3", AST-B06@3", AST-B07@3", AST-B08@3", PW-B01@6', PW-B02@6', PW-S01@3', PW-S02@3', SEP-B01@3", SEP-B02@3", SEP-B03@3", SEP-B04@3") were submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results indicated that the naphthalene, 1-methylnaphthalene, 2-methylnaphthalene concentrations in soil sample PW-S01@3', the nickel concentration in soil sample PW-B02@6', the EC value in soil sample SEP-B02@3", and the pH value in soil sample AST-B05@3" exceeded the applicable ECOM Table 915-1 and/or site-specific background limits. As such, a Form 19-Initial Spill/Release Report (Document No. 403978852) was submitted on November 1, 2024, and the ECOM assigned Spill/Release Point ID 488454. Analytical results for pH in soil sample AST-B05@3" indicated a pH value 0.03 units above Table 915-1 standards. Given the low magnitude of the pH exceedance and the lack additional exceedances in the soil sample, the pH in soil sample AST-B05@3" is considered to be de minimis in value and not indicative of a release at the former AST location. 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 are presented in Table 1.

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 22, 2024, Fourteen (14) confirmation soil samples were collected from the base and sidewalls of the PWV excavation extent at depths ranging from 3' - 8' (bgs). Based on the results for waste characterization soil samples PW-S01@3' and PW-B02@6', the confirmation soil samples were submitted for laboratory analysis of the site-specific waste profile. Laboratory analytical results indicated that the selenium concentrations in soil samples PW-S03@6' and PW-B03@7' and the 1-methyl. concentration in soil sample PW-W03@6' exceeded ECOM Table 915-1 and/or background limits. Verification soil samples (PW-S03V@3' and PW-B03V@7') were collected to verify the selenium exceedances and analytical results indicated that the selenium concentrations in the verification soil samples were compliant with ECOM Table 915-1 and/or site-specific background limits. Excavation and assessment activities are on hold due to high-priority habitat restrictions and will resume after July 31, 2026.

Proposed Groundwater Sampling

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

During remediation activities, groundwater was encountered within the excavation area at approximately 7 ft bgs. On November 22, 2024, groundwater sample (GW-01) was collected from the excavation area and submitted for laboratory analysis of the full ECOM Table 915-1 constituents in groundwater. Laboratory analytical results indicated that the total dissolved solids and sulfate concentrations in groundwater sample GW-01 exceeded ECOM Table 915-1 standards. Background groundwater samples will be collected to assess the naturally occurring inorganic constituent concentrations in the groundwater near the former production facility.

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 October 18 - 25, 2024, visual inspection and field screening of soils was conducted at 3 sidewalls in each PWV excavation, beneath four former ASTs, one ECD, one meter house, and three dump line potholes. 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 ECOM Operator Guidance for Oil & Gas Facility Closure document.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 29

Number of soil samples exceeding 915-1 27

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 1060

NA / ND

-- Highest concentration of TPH (mg/kg) 235.4

-- Highest concentration of SAR 3.31

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 7

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____

ND Highest concentration of Toluene (µg/l) _____

ND Highest concentration of Ethylbenzene (µg/l) _____

ND Highest concentration of Xylene (µg/l) _____

NA 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', PW-BG01@6' - PW-BG04@6', were collected from native non-impacted material nearby at the tank battery. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters and Table 915-1 metals using standard methods appropriate for detecting target analytes in Table 915-1. Background soil samples are illustrated on Figure 2. Background soil sample analytical results are summarized in Tables 3 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?

Excavation and assessment activities to address the remaining 1-methylnaphthalene impact in the PWV excavation, inorganic impacts at the separator, and background groundwater sample collection are currently on hold due to High Priority Habitat restrictions and will resume after July 31, 2026.

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.

Excavation and assessment activities to address the remaining 1-methylnaphthalene impact in the PWV excavation, inorganic impacts at the separator, and background groundwater sample collection are currently on hold due to High Priority Habitat restrictions and will resume after July 31, 2026.

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.

Excavation and assessment activities to address the remaining 1-methylnaphthalene impact in the PWV excavation, inorganic impacts at the separator, and background groundwater sample collection are currently on hold due to High Priority Habitat restrictions and will resume after July 31, 2026.

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.

Background groundwater samples will be collected to assess the naturally occurring inorganic constituent concentrations in the groundwater near the former production facility.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

Request Alternative Reporting Schedule:

Semi-Annually Annually Other Within 90 days of resuming work or 12/1/2026; quarterly reporting will resume following submittal.

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: \$ 20500

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 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. 11/01/2024

Actual Spill or Release date, or date of discovery. 10/31/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/18/2024

Proposed site investigation commencement. 10/18/2024

Proposed completion of site investigation. 12/01/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2024

Proposed date of completion of Remediation. 12/01/2026

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

Soil samples PW-B01@6', PW-B02@6', PW-S01@3', and PW-S02@3', collected from within the footprint of the impacted excavation area were submitted for laboratory analysis of the full ECMC Table 915-1 and were utilized to create a site-specific waste profile for this location. Subsequent confirmation soil samples were submitted for laboratory analysis of a reduced analyte list based off of the laboratory analytical results of the soil samples referenced above. KMOG requests approval to amend confirmation sampling and analysis to only include total petroleum hydrocarbons (TPH), naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, acenaphthene, anthracene, fluorene, and Table 915-1 metals.

Laboratory analytical results for soil sample AST-B05@3" indicated a pH value of 8.33 (0.03 pH units higher than ECMC Table 915-1 standards). Given the low magnitude of the pH exceedance and the lack of additional exceedances in the soil sample, the pH concentration is considered to be de minimis in value and not indicative of a release at the former AST location.

The scientific justification for the inclusion of verification samples PW-S03V@6' and PW-B03V@7' are the lack of release indicators in the parent samples (PW-S03@6' and PW-B03@7'). Analytical results of the parent samples were absent of organic detections and other ECMC Table 915-1 and/or background exceedances.

This remediation project is located within a Bald Eagle Next 1/2 mile buffer HPH. Remaining remediation activities at the site include excavation with heavy equipment, which constitutes potentially significant wildlife disturbance. As a result, excavation will not occur until the CPW seasonal next stipulations end (August 1).

An alternative reporting schedule has been requested on this form. A subsequent Form 27 will be submitted within 90 days after resuming work or by 12/1/2026. After work resumes or 12/1/2026, a quarterly reporting schedule shall resume.

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: 01/28/2026

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: RICK ALLISON

Date: 03/06/2026

Remediation Project Number: 32949

COA Type

Description

	ECMC agrees to the proposed reporting schedule.
	When conducting additional excavation of the 1-methylnaphthalene impact in the PWV excavation, the Operator shall analyze confirmation soil samples for Table 915-1 Soil TPH (C6-C36) and Organic Compounds in Soils.

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

404471421	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
404475126	SITE MAP
404475145	LABORATORY ANALYTICAL REPORT
404475147	LABORATORY ANALYTICAL REPORT
404475149	LABORATORY ANALYTICAL REPORT
404475152	LABORATORY ANALYTICAL REPORT
404520912	SOIL SAMPLE LOCATION MAP
404521252	SOIL SAMPLE LOCATION MAP
404521253	PHOTO DOCUMENTATION
404521254	ANALYTICAL DATA SUMMARY TABLE(S)
404570364	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 11 Files

General Comments

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

Total: 0 comment(s)