FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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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 INFORMATON

Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP Operator No: 47120
Address: P O BOX 173779
City: DENVER State: CO Zip: 80217-3779
Contact Person: Max Moran

Phone Numbers
Phone: (720) 929-4307
Mobile: ( )
Email: DJRemediation_Forms@oxy.com

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40001 Initial Form 27 Document #: 404130835

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.
- [X] 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.
- [X] 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.
- [X] Other: Request Director's Approval to establish site-specific waste profile

SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL Facility ID: API #: 123-15786 County Name: WELD
Facility Name: HSR-MILLER 7-10 Latitude: 40.241700 Longitude: -104.761440
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWNE Sec: 10 Twp: 3N Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 490346 API #: County Name: WELD
Facility Name: Miller 7-10 Wellhead Latitude: 40.241703 Longitude: -104.761424
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWNE Sec: 10 Twp: 3N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Livestock

Is domestic water well within 1/4 mile? Yes

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Domestic water well: multiple domestic wells located within a 1/4 mile
Surface water: none
Wetlands: none
Spring: none
Livestock: multiple livestock areas within 1/4 mile
Occupied Building: multiple occupied buildings located within a 1/4 mile
High Priority Habitats: none

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

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.

Wellhead cut and cap operations and flowline removal activities were completed at the Miller 7-10 wellhead on May 12, 2025 through July 22, 2025. Groundwater was not encountered in the wellhead cut and cap excavation area or flowline removal pothole excavation areas. Visual inspection and field screening of soils around the well, associated pumping equipment, and flowline removal potholes was conducted following wellhead cut and cap operations and flowline removal activities, and soil samples (WH-B01@6', WH-RIS@4', SEP-RIS@4', and FL-B01@4') were submitted for laboratory analysis of Table 915-1 Contaminants of Concern to determine if a release occurred. Laboratory analytical results indicated that the 1,2,4-trimethylbenzene (1,2,4–TMB), 1,3,5-trimethylbenzene (1,3,5–TMB), and lead concentrations in soil sample WH-RIS@4', and the pH concentration in soil sample WH-B01@6' exceeded the applicable ECMC Table 915-1 standards. As such, a Form 19 Initial/Supplemental Spill/Release Report (ECMC Document 404216476) was submitted on May 23, 2025, and the ECMC issued Spill/Release Point ID 490346. Soil sample location and field screening data are presented in Table 1. Soil analytical results are presented in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figure 1. The secured laboratory analytical report is attached. The field notes and a photographic log are attached.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

On 5/12/25-7/16/25, soil samples were collected from the base of the cut & cap excavation area (WH-B01@6'), from the locations where the flowline risers were disconnected at the wellhead & separator (WH-RIS@4', SEP-RIS@4'), & from the directional change of the flowline (FL-B01@4'). The soil samples were submitted for analysis of the full ECMC Table 915-1 analytical suite. Analytical results indicated that the 1,2,4–TMB, 1,3,5–TMB, & Pb concentrations in soil sample WH-RIS@4' and the pH in soil sample WH-B01@6' exceeded the applicable ECMC Table 915 standards and/or background limits. Based on waste characterization results from the wellhead, KMOG proposes to analyze future confirmation soil samples for pH, TPH, TMBs, arsenic, barium, copper, lead, and selenium. Additional assessment and/or excavation activities are ongoing to address the remaining soil impacts.

Proposed Groundwater Sampling

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

Groundwater was not encountered during initial wellhead cut and cap operations or flowline removal activities. If groundwater is encountered during remaining 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 and Groundwater Inorganic Parameters 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 May 12, 2025 - July 22, 2025, visual inspection and field screening of soils was conducted at 4 sidewall locations within the cut and cap excavation area, 4 locations at the ground surface adjacent to the excavation, and 14 flowline removal potholes. Based on the inspection and screening results, hydrocarbon impacted soil was not observed at the screening locations, and no soil samples were submitted for laboratory analysis from these areas in accordance with the ECMC Operator Guidance. On May 19, 2025, a soil gas survey was conducted at five soil vapor points (SVP-01 - SVP-05) installed adjacent to the former wellhead location following cut and cap operations. GEM 5000 field readings were non-detect for methane at all five soil vapor points. SVP screening results are presented in Table 6.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 6

Number of soil samples exceeeding 915-1: 5

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

Approximate areal extent (square feet): 240

NA / ND

-- Highest concentration of TPH (mg/kg): 21.93

-- Highest concentration of SAR: 0.465

BTEX > 915-1: No

Vertical Extent > 915-1 (in feet): 6

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?

[X] Were background samples collected as part of this site investigation?

Background soil samples WH-BG01 - WH-BG03 were collected from non-impacted native material adjacent to the wellhead cut and cap excavation at depths ranging from approximately 3'-6' bgs. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters in Soils and Table 915-1 Metals using standard methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are presented 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):

[X] Is further site investigation required?

Additional assessment and/or excavation activities to address the remaining exceedances in soil samples WH-B01@6' and WH-RIS@4' are ongoing and will be summarized in a forthcoming quarterly 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 assessment and/or excavation activities to address the remaining exceedances in soil samples WH-B01@6' and WH-RIS@4' are ongoing and will be summarized in a forthcoming quarterly Form 27-Supplemental. If required, soil will be removed and transported to a licensed disposal facility.

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 assessment and/or excavation activities to address the remaining exceedances in soil samples WH-B01@6' and WH-RIS@4' are ongoing and will be summarized in a forthcoming quarterly Form 27-Supplemental.

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:

[X] 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: $ 12000

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. 02/13/2025

Actual Spill or Release date, or date of discovery. 05/23/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/12/2025

Proposed site investigation commencement. 05/12/2025

Proposed completion of site investigation. 03/31/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/23/2025

Proposed date of completion of Remediation. 03/31/2026

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

Based on waste characterization results from the wellhead, KMOG proposes an amended sampling and analysis plan to only include only detected organic constituents, detected metal constituents (including boron), and soil suitability parameters exceeding Table 915-1. Based on the data presented herein, KMOG proposes to analyze future confirmation soil samples for pH, TPH, TMBs, arsenic, barium, copper, lead, and selenium.

The previous Form 27-Supplemental (Doc.# 404238710, submitted 6/17/25) is still in process with the ECMC.

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: 09/15/2025 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: Taylor Robinson Date: 03/31/2026

Remediation Project Number: 40001

COA Type	Description
	ECMC agrees to the reduced analyte list below: BTEX, pH, boron, TPH, TMBs, arsenic, barium, copper, lead, and selenium.
1 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
404345780	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
404345876	ANALYTICAL DATA SUMMARY TABLE(S)
404345878	SOIL SAMPLE LOCATION MAP
404345879	PHOTO DOCUMENTATION
404345880	LABORATORY ANALYTICAL REPORT
404602240	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 6 Files

General Comments

User Group	Comment	Comment Date
Environmental	Operator to note the ECMC reserves the right to return any constituent(s) back to the sampling and analysis plan based on changing site conditions.	03/31/2026

Total: 1 comment(s)