

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404506474
Receive Date:
01/26/2026
Report taken by:
Grace Rollins

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 #: 42401 Initial Form 27 Document #: 404295241

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

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-34755</u>	County Name: <u>WELD</u>
Facility Name: <u>LUDWIG H 06-31D</u>	Latitude: <u>40.260940</u>	Longitude: <u>-104.714920</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>6</u>	Twp: <u>3N</u>	Range: <u>65W</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? No
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Surface water: None.

Wetlands: None.

Water Wells: The nearest water well is located 865 feet northwest of the location.

Springs: None.

Occupied Building: A building is located approximately 734 feet north-northwest of the location.

Livestock: Livestock is located approximately 869 feet northwest of the location.

High Priority Habitats: None.

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
No	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.

Wellhead cut and cap activities were completed at the Ludwig H 03-31D wellhead location on November 24, 2025. Visual inspection and field screening of soils around the wellhead and associated pumping equipment were conducted following cut and cap operations, and one (1) soil sample (WH-B01@6') was collected and submitted for laboratory analysis of the full Table 915-1 analytical suite to determine if a release had occurred. Laboratory analytical results indicated that constituent concentrations for the confirmation soil sample was in compliance with Table 915-1 standards and/or site-specific background levels (x 1.25 for metals), with the exception of pH. Soil sample WH-B01@6' (8.51 Standard Units [S.U.]) was in exceedance of the Table 915-1 standard. Soil sampling and screening results at the wellhead were absent of other release indicators (e.g., organic analyte detections and additional ECMC Table 915-1 exceedances). Compared to the established site-specific background for pH (8.33 S.U.), the elevated pH at WH-B01@6' is considered de minimis and not an indication of a spill or release associated with E&P activities. The associated flowline was permanently removed in March 2023 and was documented under remediation number 27879. A topographic Site Location Map showing the geographic setting of the site is provided as Figure 1. The soil sample and field screening locations are illustrated on Figure 2. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 through 5.

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 24, 2025, one (1) confirmation soil sample was collected from the base of the wellhead cut and cap excavation. The soil sample was submitted for laboratory analysis of the full Table 915-1 analytical suite. Analytical results indicated that constituent concentrations in the confirmation soil sample 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 at soil sample WH-B01@6' (8.51 S.U.). Due to the absence of organic analyte detections, absence of additional Table 915-1 exceedances, and elevated site-specific background for pH (8.33 S.U.), the elevated pH level is considered de minimis and not an indication of a release associated with E&P activities.

Proposed Groundwater Sampling

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

Groundwater was not encountered during wellhead cut and cap activities.

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 November 24, 2025, visual inspection & field screening of soils was conducted at four (4) sidewall locations within the Ludwig H 03-31D wellhead excavation area and four (4) locations at the ground surface adjacent to the excavation. 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. On December 1, 2025, a soil gas survey was conducted at five (5) soil vapor points (SVP01-SVP05) installed adjacent to the former wellhead following cut and cap operations. GEM 5000 field readings were non-detect for methane for the five (5) vapor points. The soil vapor screening results are summarized in Table 6. 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 1

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 2.53

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?

Nine (9) background samples were collected from undisturbed native material adjacent to the Ludwig H 03-31D wellhead 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. Analytical results for the background soil samples are presented in Tables 4 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?

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.

Laboratory analytical results indicated that constituent concentrations in the confirmation soil sample collected during wellhead 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 at WH-B01@6' (8.51 S.U.). Due to the absence of organic analyte detections and additional Table 915-1 exceedances at the wellhead and elevated site-specific background for pH (8.33 S.U.), the elevated pH at WH-B01@6' location is considered de minimis and not an indication of a spill or release associated with E&P activities. As a result, no soils were removed during wellhead cut and cap and flowline removal activities. The excavation areas were subsequently backfilled and re-graded to match pre-existing conditions.

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.

Laboratory analytical results indicated that constituent concentrations in the confirmation soil sample collected during wellhead cut and cap activities were in compliance with ECMC Table 915-1 standards, and/or site specific background levels (x 1.25 metals) with the exception of pH at WH-B01@6' (8.51 S.U.). However, due to the absence of organic analyte detections and additional Table 915-1 exceedances at the wellhead and elevated site-specific background for pH (8.33 S.U.), the elevated pH at the WH-B01@6' sample location is considered de minimis and is not an indication of a spill or release associated with the E&P activities. Hydrocarbon-impacted soil was not observed during field inspection and soil screening activities at the wellhead. Groundwater was not encountered during wellhead cut and cap soil sampling activities. Based on the analytical and soil screening data presented herein, assessment is complete at the Ludwig H 03-31D wellhead and no further activities are required. The associated flowline was permanently removed in March 2023 and was documented under remediation number 27879. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

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.

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 NFA request _____

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: \$ 0 _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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. 02/01/2026

Proposed date of completion of Reclamation. 02/01/2027

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. 06/24/2025

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/24/2025

Proposed site investigation commencement. 11/24/2025

Proposed completion of site investigation. 11/24/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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 the analytical and soil screening data presented herein, Kerr-McGee is requesting an NFA determination for this location.

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: 01/26/2026

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: Grace Rollins

Date: 04/22/2026

Remediation Project Number: 42401

COA Type**Description**

	The associated flowline removal is being reported under Remediation Project # 27879. In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days) for Remediation Project # 27879.
	Based on the information presented, it appears the elevated pH sample from the wellhead area appears to be de minimis in quantity or within the range of background pH; therefore, elevated pH may not be associated with E&P activities. It appears that no further remedial action is necessary at this time and the ECMC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or background levels or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required. The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
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
404506474	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404517949	MAP
404517950	SOIL SAMPLE LOCATION MAP
404517951	ANALYTICAL DATA SUMMARY TABLE(S)
404517952	PHOTO DOCUMENTATION
404517953	OTHER
404517954	LABORATORY ANALYTICAL REPORT
404630802	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)