

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: KERR MCGEE OIL & GAS ONSHORE LP	Operator No: 47120	Phone Numbers Phone: (720) 929-4307 Mobile: ()
Address: P O BOX 173779		
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Max Moran	Email: DJRemediation_Forms@oxy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37459 Initial Form 27 Document #: 403956999

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: WELL	Facility ID: _____	API #: 123-22294	County Name: WELD
Facility Name: MARCUS STATE W 36-6J1	Latitude: 40.096068	Longitude: -104.728420	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 36	Twp: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 491877	API #: _____	County Name: WELD
Facility Name: Marcus St W 36-6J Flowline	Latitude: 40.094964	Longitude: -104.731812	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 36	Twp: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 491982 API #: _____ County Name: WELD
 Facility Name: Marcus St W 36-6J Wellhead Latitude: 40.096068 Longitude: -104.728420
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: SENW Sec: 36 Twp: 2N Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 491989 API #: _____ County Name: WELD
 Facility Name: Marcus St W 36-6J Flowline Latitude: 40.096260 Longitude: -104.728798
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: SENW Sec: 36 Twp: 2N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Rangeland
 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? No

Other Potential Receptors within 1/4 mile

Surface water: Speer Canal is approximately 929 feet south of the location.
 Wetlands: An area with wetland characteristics is located 929 feet south of the location.
 Water Wells: The nearest water well is located 972 feet south-southeast of the location.
 Springs: None.
 Occupied Building: A building is located approximately 773 feet southeast of the location.
 Livestock: The location resides within cattle rangeland.
 High Priority Habitats: The location resides within a Bald Eagle Active Nest Site Half Mile Buffer High Priority Habitat (HPH).

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
UNDETERMINED	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 initiated at the Marcus St W 36-6J wellhead location on August 19, 2025. Visual inspection and field screening of soils around the wellhead and associated pumping equipment were conducted following cut and cap operations, and two (2) soil samples (WH-B01@6' and WH-Riser@4') were collected and submitted for laboratory analysis. Removal of the flowline associated with this wellhead was conducted between October 8 and 23, 2025. Three (3) soil samples were collected from the locations where the flowline riser was disconnected at the separator (SEPRiser@4') and significant directional changes (FL-B01@3' and FL-B10@4'). 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, with the exception of pH and lead (Pb) in WH-B01@6', Pb in WH-Riser@4', benzo(a)anthracene (benzo(a)a) and chromium (VI) (Cr(VI)) in SEP-Riser@4', and naphthalene and benzo(a)a) in FL-B01@3'. As such, Form 19-Initial Spill/Release Reports (Document Nos. 404398219, 404397362, and 404397319) were submitted on October 22, 2025, and the ECOM issued Spill/Release Point IDs 491877, 491989, and 491982, respectively.

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):

Between August 19 and October 23, 2025, five (5) confirmation soil samples were collected from the base of the wellhead cut and cap excavation area, from where the flowline riser was disconnected from the wellhead and separator, and at flowline significant directional changes. Analytical results indicate that constituent concentrations in the confirmation soil samples were in compliance with ECOM Table 915-1 standards with the exception of pH and Pb in WH-B01@6', Pb in WH-Riser@4', benzo(a)a) and Cr(VI) in SEP-Riser@4', and naphthalene and benzo(a)a) in FL-B01@3'.

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 wellhead cut and cap sampling activities to date. If groundwater is encountered during plugging and abandonment activities, a minimum of one (1) grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for all analytes listed in ECOM Table 915-1 Organic Compounds in Groundwater and Groundwater Inorganic Parameters using standard methods appropriate for detecting the target analytes in ECOM 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 August 19, 2025, field screening of soils was conducted at four (4) sidewall locations within the cut and cap excavation and four (4) locations at ground surface adjacent to the cut and cap excavation area, and eight (8) pothole locations during flowline removal activities. 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 in accordance with ECOM Operator Guidance. On August 27, 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 all vapor points surveyed.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 915-1 4
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 7.05
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
0 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 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.

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?

Laboratory analytical results indicate that impacts to soil remain at the Marcus St W 36-6J wellhead and flowline locations.

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.

Analytical results indicated that constituent concentrations in soil samples WH-B01@6', WH-Riser@4', SEP-Riser@3', and FL-B01@3' exceeded ECMC Table 915-1 standards. Excavation and additional site assessment activities 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 _____

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? 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 reseeded 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. 10/20/2025

Actual Spill or Release date, or date of discovery. 10/20/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/19/2025

Proposed site investigation commencement. 08/19/2025

Proposed completion of site investigation. 09/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/01/2026

Proposed date of completion of Remediation. 09/30/2026

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

No additional site assessment activities have been conducted since a previous Form 27 Supplemental-update was submitted (Document No. 404421671). Excavation and site assessment activities are on hold. Work is anticipated to resume by 9/1/2026.

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: 04/28/2026

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: _____

Date: _____

Remediation Project Number: 37459

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**

404599659	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>	04/30/2026
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Total: 1 comment(s)