

State of Colorado
Energy & Carbon Management Commission

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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
Address: P O BOX 173779		
City: DENVER	State: CO	Zip: 80217-3779
Contact Person: Erik Mickelson	Email: DJRemediation_Forms@oxy.com	Phone: (720) 929-4306
		Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40035 Initial Form 27 Document #: 404128832

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: WELL	Facility ID: _____	API #: 123-23315	County Name: WELD
Facility Name: BRIGHT 24-4	Latitude: 40.253660	Longitude: -104.777420	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 4	Twp: 3N	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM	Most Sensitive Adjacent Land Use Occupied Buildings and Surface Water
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

Evans #2 Ditch 240 feet (ft) south. Occupied buildings 440 ft southeast, 740 ft northeast, 1030 ft southwest, and 1290 ft northwest. Ponds 450 ft southwest, 480 ft northeast, and 1170 ft north. Platte Valley Canal 790 ft southeast. Water well 670 ft southeast. Livestock 1050 ft southwest, 1090 ft northeast, and 1230 ft northwest. County road 1230 ft east. Areas with wetland characteristics are located approximately 270 ft east, 490 ft west, and 1120 ft north. Agriculture.

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	Groundwater Samples/Laboratory Analytical Results
UNDETERMINED	SOILS	TBD	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 were completed at the Bright 24-4 wellhead on November 24, 2025. Groundwater was not encountered in the cut and cap excavation. Visual inspection and field screening of soil around the wellhead and associated pumping equipment were conducted following cut and cap operations. A soil sample [B01(24-4)@4'] was submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. The flowline associated with the wellhead was removed between February 25 and March 2, 2026. Samples were collected from the locations where the flowline risers were disconnected from the wellhead [WH-Riser(24-4)@4'] and from the separator [SEP-Riser(24-4)@3'], and from where groundwater was present in the flowline potholes [FL01@3' and FL02@3']. Samples were submitted for full list Table 915-1 constituents to determine if a release occurred. Initial laboratory analytical results indicated that arsenic and lead exceeding the Table 915-1 allowable levels and background levels are present at the FL02 and WH-Riser locations. The sample collected at the FL02 location was rerun for arsenic and final analytical results were in compliance with the Table 915-1 allowable level or within background level for arsenic. The wellhead and flowline are depicted on Figures 1 and 2. The PID readings and soil sample results are summarized in Tables 1 and 2, 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 November 24, 2025 and March 2, 2026, soil samples were collected from the wellhead excavation [B01(24-4)@4'], from the locations where the flowline risers were disconnected from the wellhead [WH-Riser(24-4)@4'] and from the separator [SEP-Riser(24-4)@3'], and from where groundwater was present in the flowline potholes [FL01@3' and FL02@3'] at depths ranging from of 3 ft below ground surface (bgs) to 4 ft bgs. The samples were submitted for analysis of full list Table 915-1 constituents, using ECOM approved methods. Initial laboratory analytical results indicated that arsenic and lead exceeding the Table 915-1 allowable levels and background levels are present at the FL02 and WH-Riser locations. The sample collected at the FL02 location was rerun for arsenic and final analytical results were in compliance with the Table 915-1 allowable level or within background level for arsenic. The laboratory reports are attached.

Proposed Groundwater Sampling

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

On February 27, 2026, two groundwater samples [GW-FL01@3' and GW-FL02@3'] were collected from the FL01 and FL02 locations at a depth of 3 ft bgs. Background groundwater samples are needed to assess compliance of Total Dissolved Solids (TDS), chloride, and sulfate. The groundwater samples were submitted for analysis of full list Table 915-1 constituents in groundwater. Based on the laboratory analytical results groundwater concentrations were in compliance with ECOM Table 915-1 allowable levels for all organic analytes. The groundwater sample locations are depicted on Figure 2. The groundwater sample analytical results are summarized in Table 3.

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):

Between November 24, 2025 and March 2, 2026, visual inspection and field screening of soil were conducted at four sidewall locations within the cut and cap excavation area, four locations at the ground surface adjacent to the cup and cap excavation area, and eight flowline 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. A photographic log is attached.

On December 3, 2025, a soil gas survey was conducted at four soil vapor points installed adjacent to the former wellhead location following cut and cap operations. One additional SVP was blocked and could not be screened. GEM 5000 field readings were all non-detect for methane at all soil vapor points. The soil vapor point locations are illustrated on Figure 1.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 5
Number of soil samples exceeding 915-1 5
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 10.7
 BTEX > 915-1 No
 Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 2
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 3
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?

Empty text box for additional information.

Were background samples collected as part of this site investigation?

Twelve background soil samples (NATIVE-BG01@3' through NATIVE-BG06@3' and NATIVE-BG01@6' through NATIVE-BG06@6') were collected from the native material outside of the wellhead excavation area. Twelve background samples were also collected as part of the Bright 24-4, Johnson 1 facility decommissioning activities (Remediation No. 40039), located approximately 1225 ft northwest, from similar depths (3' and 6' bgs), and NRCS soil type (loamy sand). Background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron and Table 915-1 metals using ECMC approved methods. Analytical results indicate that EC, SAR, pH, boron, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium are naturally high in the native soil. The background soil sample analytical results are summarized in Table 2. The background soil sample locations are illustrated on Figure 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?

Additional assessment activities are pending and details will be provided in a subsequent Form 27 supplemental report.

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No _____

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If a suspected release is identified and confirmed through soil screening and/or laboratory analysis, soil will be removed and transported to a licensed disposal facility. Disposal records will be kept on file and available upon request.

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 data indicate that lead exceeding the Table 915-1 allowable level and background level is present at the WH-Riser(24-4) location. Additional background samples will be collected to determine compliance. Groundwater was encountered at approximately 3 ft bgs. Analytical results indicate that groundwater concentrations were in compliance with ECMC Table 915-1 allowable levels for organic analytes. Background groundwater samples are needed to assess compliance of TDS, chloride, and sulfate.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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.

Empty rectangular box for groundwater monitoring details.

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. 03/18/2025

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. 10/02/2026

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

KMOG has included the rerun results from FL02@3' for further assessment of the inorganic ECMC Table 915-1 exceedances (arsenic). The scientific justification for the inclusion of these rerun results is the absence of other release indicators in the parent samples FL02@3'. Analytical results were non-detect for all Table 915-1 organic constituents and within Table 915-1 and/or established site-specific background limits for soil suitability for reclamation and metal analytes.

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

Signed: Erik Mickelson

Title: Environmental Lead

Submit Date: _____

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: 40035

COA Type**Description**

COA Type	Description
0 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**

404623259	PHOTO DOCUMENTATION
404623261	LABORATORY ANALYTICAL REPORT
404623262	LABORATORY ANALYTICAL REPORT
404623264	LABORATORY ANALYTICAL REPORT
404623265	LABORATORY ANALYTICAL REPORT
404625477	SOIL SAMPLE LOCATION MAP
404625481	SOIL SAMPLE LOCATION MAP
404626819	SOIL SAMPLE LOCATION MAP
404633364	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 9 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)