

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404627010

Receive Date:

Report taken by:

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40235 Initial Form 27 Document #: 404138762

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: Request Director's Approval to establish site-specific waste profile.

SITE INFORMATION

Yes Multiple Facilities

Facility Type: TANK BATTERY	Facility ID: 489595	API #:	County Name: WELD
Facility Name: Smits Fed/Schmidt P2 Tank Battery 489595	Latitude: 40.128042	Longitude: -104.807835	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNW	Sec: 20	Twp: 2N	Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>491654</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Smits Fed,Schmidt P2 Facility</u>	Latitude: <u>40.128572</u>	Longitude: <u>-104.807732</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>20</u>	Twp: <u>2N</u>	Range: <u>66W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>491655</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Smits Fed,Schmidt P2 Facility</u>	Latitude: <u>40.128221</u>	Longitude: <u>-104.807864</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>20</u>	Twp: <u>2N</u>	Range: <u>66W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications <u>SM</u>	Most Sensitive Adjacent Land Use <u>Surface Water & Commercial Buildings</u>
Is domestic water well within 1/4 mile? <u>Yes</u>	Is surface water within 1/4 mile? <u>Yes</u>
Is groundwater less than 20 feet below ground surface? <u>Yes</u>	

Other Potential Receptors within 1/4 mile

Platteville Ditch 40 feet (ft) southeast. Railroad 200 ft west. Water well 240 ft northwest. Commercial buildings 550 ft west, 680 ft northwest, 840 ft southwest, and 1120 ft northeast. Industrial infrastructure 600 ft north. US Hwy 760 ft west. County road 880 ft north. Livestock 1060 ft southwest. Occupied building 1260 ft northwest. Agriculture. The site is located within a Bald Eagle Active Nest Site Half Mile High Priority Habitat (HPH) area.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	TBD	Groundwater Samples/Laboratory Analytical Results
Yes	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.

Decommissioning activities were completed at the Smits Fed.Schmidt P2 facility on September 10, 2025. Groundwater was not encountered in the facility excavations. Visual inspection and field screening of soil at one aboveground storage tank (AST), one produced water vessel (PWV), one separator, one emission control device (ECD), and one meter house location were conducted following removal activities. Soil samples [AST01@0.5', PWV-B01@5', PWV-N01@2.5', SEP01-Inlet@3', and SEP01-Outlet@3'] were submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. Laboratory analytical results indicated that total petroleum hydrocarbon (TPH), 1,2,4- and 1,3,5-trimethylbenzene (TMB), polycyclic aromatic hydrocarbon (PAH), barium, cadmium, hexavalent chromium, lead, and/or selenium impacts exceeding the ECMC Table 915-1 allowable levels and background levels are present at the AST01, SEP01-Inlet, and SEP01-Outlet locations. As such, a Form 19 Initial/Supplemental Spill/Release Reports (Document Nos. 404372907 and 404372919) were submitted on October 1, 2025, and the ECMC issued Spill/Release Point IDs 491654 and 491655. 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):

On September 10, 2025, soil samples were collected from one AST, one PWV, and one separator at depths ranging from 0.5 ft below ground surface (bgs) to 5 ft bgs. The samples were submitted for analysis of full list Table 915-1 constituents, using ECMC approved methods. Laboratory analytical results indicated that TPH, 1,2,4- and 1,3,5-TMB, PAH, barium, cadmium, hexavalent chromium, lead, and/or selenium impacts exceeding the ECMC Table 915-1 allowable levels and background levels are present at the AST01, SEP01-Inlet, and SEP01-Outlet locations. The laboratory report is attached.

Proposed Groundwater Sampling

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

Groundwater was not encountered during facility decommissioning 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 September 10, 2025, visual inspection and field screening of soil were conducted at the base and loadout of the AST, three sidewalls within the PWV excavation, one ECD, and one meter house. 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.

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) 969

NA / ND

-- Highest concentration of TPH (mg/kg) 1064
-- Highest concentration of SAR 0.578
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

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?

Were background samples collected as part of this site investigation?

Twelve background soil samples were collected as part of the Smits Smits Federal 6-20A wellhead cut and cap activities (Remediation No. 40075), located approximately 1900 ft southeast, from similar depths (3' and 6' bgs), same land use, and NRCS soil type (sandy loam). 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 pH and arsenic are naturally high in the native soil.

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 activities are on hold until after August 1, 2026, due to this location being located within a High Priority Bald Eagle Active Nest Site ½ Mile HPH Buffer. Future activities will be summarized in a subsequent Form 27 Supplemental report.

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 from the AST01, SEP01-Inlet, and SEP01-Outlet locations will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of assessment activities. Disposal records are kept on file and available upon request. The excavation areas 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.

Laboratory data indicate that TPH, 1,2,4- and 1,3,5-TMB, PAH, barium, cadmium, hexavalent chromium, lead, and/or selenium impacts exceeding the ECMC Table 915-1 allowable levels and background levels remain at the AST01, SEP01-Inlet, and SEP01-Outlet locations. Groundwater was not encountered during facility decommissioning activities.

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 _____

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: \$ 13000 _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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. 09/30/2025

Actual Spill or Release date, or date of discovery. 09/29/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/10/2025

Proposed site investigation commencement. 09/10/2025

Proposed completion of site investigation. 10/20/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/10/2025

Proposed date of completion of Remediation. 10/20/2026

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

Per Rule 915.e.(2).C, discrete grab samples [AST01@0.5', SEP01-Inlet@3', and SEP01-Outlet@3'] were collected from the most impacted material available in the source area on 9/10/2025. The laboratory report and results summary table are attached. Based on these results, KMOG requests approval to amend confirmation sampling and analysis to only include hydrocarbon and metal analytes detected above laboratory reporting limits and reclamation parameters exceeding Table 915-1 allowable levels, specifically:
For AST01@0.5': TPHs, benzene, toluene, ethylbenzene, total xylenes (BTEX), TMBs, PAHs, arsenic, barium, cadmium, hexavalent chromium, and selenium.
For SEP01-Inlet@3' and SEP01-Outlet@3': TPHs, PAHs, boron, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium.

KMOG will not conduct intrusive operations related to this form between 12/1 – 7/31 in compliance with the 0.5 mile Bald Eagle Nesting Buffer.

KMOG has a large number of active remediation projects that fall within High Priority Habitats (HPH), which limits when field work can be completed on these projects. This project falls within the ½ mile Bald Eagle Nest HPH buffer, and field work can only be conducted between August 1st and November 30th each year. The projects within HPH buffers are being prioritized based on potential environmental risk; considering factors such as size of impact, type of impact, what media is impacted, proximity to sensitive receptors and land use. This project is categorized as low environmental risk because groundwater was not encountered during facility decommissioning activities and the current land use is undeveloped/rangeland.

Per the Conditions of Approval issued by the ECMC for Document No. 404372919 and 404372907:

COA#1: The surface water body within 100' of the release area is a concrete lined ditch which is elevated above the release area. As this release did not threaten to impact the surface water body, notification to the Environmental Release/Incident Report Hotline is not warranted.

COA#2: The surface water body within 100' of the release area is a concrete lined ditch which is elevated above the release area. This release did not have the ability to reach the surface water body, and therefore, a surface water sample is not warranted.

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: 40235

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

404628320	LABORATORY ANALYTICAL REPORT
404633748	SOIL SAMPLE LOCATION MAP
404633749	SOIL SAMPLE LOCATION MAP
404633768	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)