

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404375821  
Receive Date:  
10/27/2025

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 ECOM 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 &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b>
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 #: 31982 Initial Form 27 Document #: 403495589

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: <u>LOCATION</u>	Facility ID: <u>462009</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>HSR-SEKICH FARMS-63N67W TANK 20NENE</u>	Latitude: <u>40.218088</u>	Longitude: <u>-104.907853</u>	
** correct Lat/Long if needed: Latitude: <u>40.218377</u>		Longitude: <u>-104.907844</u>	
QtrQtr: <u>NENE</u>	Sec: <u>20</u>	Twp: <u>3N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>488394</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Sekich Farms 1&amp;2-20 Facility</u>	Latitude: <u>40.218377</u>	Longitude: <u>-104.907844</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>20</u>	Twp: <u>3N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Crop land  
Is domestic water well within 1/4 mile? No 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

Domestic water well: none  
Surface water: approximately 940' SE and 1220' SE  
Wetland: multiple areas with wetland characteristics within 1/4 mile  
Spring: none  
Livestock: none  
Occupied Building: none  
High Priority Habitats: within Mule Deer Migration Corridor, Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, Bald Eagle Active Nest Site-Half Mile, within a 1/4 mile of the boundary of Aquatic Native Species Conservation Waters, and Bald Eagle Active Nest Site Quarter Mile

## 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	GROUNDWATER	Groundwater not encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	12' (N-S) x 6' (E-W) x 2.5' bgs	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.

Decommissioning activities were completed at the Sekich Farms 1&2-20 O SA production facility on 10/1-10/2/24. Visual inspection and field screening of soils at three separators, two produced water vessels (PWV), one dumpline removal pothole, one emission control device (ECD), one knockout pot, one meter house, and three aboveground storage tanks (AST) were conducted following removal activities, and samples (AST-B01@3", AST-B02@3", AST-B03@3", SEP-B01@3', SEP-B02@6", SEP-B03@3', SEP-B04@6", SEP-B05@3', SEP-B06@6", PW-B01@5', PW-B02@5', PW-N01@3', PW-N02@3') were submitted for analysis of the full ECMC Table 915-1 analytical suite to determine if a release occurred. Laboratory analytical results indicated that the naphth., 1,2-methylnaph., and/or TPH concentrations in samples SEP-B02@6" and SEP-B06@6", and the As and Se concentrations in sample AST-B01@3" exceeded the applicable ECMC Table 915-1 standards and/or background limits. As such, a Form 19-Initial Spill/Release Report (Doc. #403944203) was submitted on 10/4/24, and the ECMC issued Spill/Release Point ID 488394. A verification sample (AST-B01-01@3") was collected and submitted for analysis of As and Se only, which was scientifically justified based on no indications of a release at this location, all organics being non-detect, and that the As and Se appear to be outliers in the dataset from this site. Final analytical results for the verification sample indicated that the As and Se concentrations were in compliance with the applicable ECMC Table 915-1 standards and/or background limits, as presented in the approved Form 27-Supp. Doc. #403980604. Additionally, reruns were conducted for Cd in sample SEP-B04@6", which was scientifically justified based on no indications of a release at this location, and the Cd result appearing to be an outlier in the dataset, as previously presented in the approved Form 27-Supp. Doc. #403980604. The secured laboratory analytical reports are attached.

### 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 October 1 through November 6, 2024, excavation activities were conducted to address remaining soil impacts at the former separators (SEP-B02@6", SEP-B06@6") and 2 confirmation soil samples were collected from the bases of the final excavation extents, at a depth of approximately 2.5' below ground surface (bgs). Based on the waste characterization results (SEP-B02@6", SEP-B06@6"), the confirmation soil samples were submitted for laboratory analysis of TPH, 1,2-methyl, benzo(a)pyrene, fluorene, anthracene, naphthalene, boron, and Table 915-1 metals (except silver and chromium VI) using ECMC-approved methods, as approved on Form 27-Supplemental Document #403980604. Final analytical results for the confirmation soil samples indicated that constituent concentrations in the confirmation soil samples collected from the final excavation extents were in compliance with ECMC Table 915-1 standards and/or within background limits. Soil analytical results are summarized in Tables 2 through 5.

#### 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 or subsequent over-excavation 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 October 1 through 2, 2024, visual inspections and field screening of soils was conducted at one former ECD, one former knockout pot, one former meter house, two produced water vessels, one dumpline removal pothole, and three former AST locations. Based on the inspection and screening results, hydrocarbon-impacted soils were not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the ECMC Operator Guidance for Oil & Gas Facility Closure document. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample location and field screening data is presented in Table 1. The facility soil sample and field screening locations are illustrated on Figure 2. The field notes and photographic log are provided are attached.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

#### Soil

Number of soil samples collected 22

Number of soil samples exceeding 915-1 17

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

Approximate areal extent (square feet) 72

#### NA / ND

-- Highest concentration of TPH (mg/kg) 780.6  
9

-- Highest concentration of SAR 0.958

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 3

#### 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?

Background soil samples AST-BG01 - AST-BG04 and PW-BG01 - PW-BG04 were collected from non-impacted native material adjacent to the tank battery at depths ranging from approximately 0.5' - 6' bgs. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters in Soils and ECMC 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. The background 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.

From October 1 through November 6, 2024, approximately 20 cubic yards of impacted soil was excavated and transported to the Front Range Landfill located in Erie, Colorado for disposal. 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.

Laboratory analytical results indicated that constituent concentrations in the confirmation soil samples collected from the final excavation extents were in compliance with the applicable ECMC Table 915-1 standards and/or within background limits. Groundwater was not encountered during decommissioning and/or over-excavation activities. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. 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 )

Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 20

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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.

# 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 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

N/A

Volume of E&P Waste (solid) in cubic yards 20

E&P waste (solid) description impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Front Range Landfill located in Erie, Colorado

Volume of E&P Waste (liquid) in barrels 0

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? 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. 10/27/2025

Proposed date of completion of Reclamation. 10/27/2026

## 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. 07/06/2023

Actual Spill or Release date, or date of discovery. 10/03/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/01/2024

Proposed site investigation commencement. 10/01/2024

Proposed completion of site investigation. 11/06/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/03/2024

Proposed date of completion of Remediation. 11/06/2024

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**

In response to the COA on Form 27-Supplemental Document #404084897, KMOG does not typically collect sidewall samples in shallow surface release excavations. This is an approach that has been widely accepted by the ECMC in the past. In lieu of sidewall samples, a base sample from each surface release excavation (SEP-B07@2.5' and SEP-B08@2.5') was collected to confirm the impacts had been removed. Based on the data presented, the impacts identified in soil samples SEP-B02@6" and SEP-B06@6" have been removed, and the remaining soil is in compliance with Table 915-1 standards.

A verification sample (AST-B01-01@3") was collected and submitted for analysis of As and Se only, which was scientifically justified based on no indications of a release at this location, all organics being non-detect, and that the As and Se appear to be outliers in the dataset from this site. Final analytical results for the verification sample indicated that the As and Se concentrations were in compliance with the applicable ECMC Table 915-1 standards and/or background limits, as presented in the approved Form 27-Supp. Doc. #403980604. Additionally, reruns were conducted for Cd in sample SEP-B04@6", which was scientifically justified based on no indications of a release at this location, and the Cd result appearing to be an outlier in the dataset, as previously presented in the approved Form 27-Supp. Doc. #403980604.

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: 10/27/2025

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: 05/06/2026

Remediation Project Number: 31982

**COA Type****Description**

	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>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.</p>
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**

404375821	FORM 27-SUPPLEMENTAL-SUBMITTED
404375963	PHOTO DOCUMENTATION
404375967	SITE MAP
404376832	LABORATORY ANALYTICAL REPORT
404376833	LABORATORY ANALYTICAL REPORT
404376834	LABORATORY ANALYTICAL REPORT
404376836	LABORATORY ANALYTICAL REPORT
404387104	SOIL SAMPLE LOCATION MAP
404387109	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 9 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)

Date Run: 5/6/2026 Doc [#404375821]