

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
404362886
Receive Date:
10/24/2025
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 #: 39911 Initial Form 27 Document #: 404072945

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 #: 123-23524	County Name: WELD
Facility Name: KERR-MCGEE 3-14	Latitude: 40.143550	Longitude: -104.859770	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 14	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes
Facility Type: SPILL OR RELEASE	Facility ID: 490352	API #: _____	County Name: WELD
Facility Name: KERR-MCGEE 3-14	Latitude: 40.143550	Longitude: -104.859770	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 14	Twp: 2N	Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Residential

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

Domestic water well: located approximately 785' E and 1260' E
Surface water: located approximately 400' W
Wetland: none
Spring: none
Livestock: none
Occupied Building: multiple occupied buildings located within a 1/4 mile
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	GROUNDWATER	Groundwater not encountered	Groundwater samples/laboratory analytical results
Yes	SOILS	19' (N-S) x 15' (E-W) x 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.

On 5/28/25, a release was discovered at the Kerr-McGee 3-14 Wellhead. As such, a Form 19-Initial Spill/Release Report (ECMC Document No. 404218632) was submitted on 5/30/25, and the ECMC issued Spill/Release Point ID 490352. The cause of the release was due to fluid daylighting from the subsurface adjacent to the wellhead during well servicing activities. Groundwater was not encountered. On 5/28/25, one soil sample (Initial Waste Characterization@3") was collected from the material most likely to be impacted based on field observations, and was submitted for laboratory analysis of Table 915-1 Contaminants of Concern. Laboratory results indicated that the 1,2-methylnaphthalene, Cr VI, and Pb concentration exceeded the applicable ECMC Table 915-1 standards and/or background limits.

Wellhead cut & cap operations & flowline removal activities were completed at the Kerr-McGee 3-14 Wellhead on 7/25/25-7/29/25, which included soil removal activities to address the remaining shallow soil impacts from the active release. Groundwater was not encountered within the wellhead cut & cap or flowline removal pothole excavation areas. Visual inspection & field screening of soils around the wellhead, associated pumping equipment, & flowline was conducted following wellhead cut & cap & flowline removal operations, & soil samples (WH-B01@5', WH-RIS@4', FL-B01@4', FL-B03@5', FL-B04@5', SEP-RIS@5') were submitted for laboratory analysis of Table 915-1 Contaminants of Concern to determine if a release occurred. Final analytical results indicated that constituent concentrations in the soil samples were in compliance with Table 915-1 standards and/or background limits.

Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 through 5. The soil sample and field screening locations are illustrated on Figures 2-4. The secured laboratory analytical reports are attached. The field notes and a photographic log 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 7/25/25-7/29/25, soil samples were collected from the base of the cut and cap excavation area (WH-B01@6'), from the locations where the flowline risers were disconnected at the wellhead (WH-RIS@4') and separator (SEP-RIS@5'), and the directional changes of the flowline (FL-B01@4', FL-B03@5', FL-B04@5'). The soil samples were submitted for laboratory analysis of the full ECMC Table 915-1 analytical suite using ECMC-approved methods. Analytical results indicated that impacted soil from the active release was removed, and constituent concentrations in the soil samples collected from the final extents were in compliance with ECMC Table 915-1 standards and/or within background limits.

Proposed Groundwater Sampling

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

Groundwater was not encountered during initial assessment activities, wellhead cut and cap operations, or flowline removal 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 7/25/25-7/29/25, visual inspection and field screening of soils was conducted at 4 sidewall locations within the cut and cap excavation area, 4 locations at the ground surface adjacent to the excavation, and 2 flowline removal 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. On 8/5/25, a soil gas survey was conducted at 5 soil vapor points (SVP-01 - SVP-05) installed adjacent to the former wellhead location following cut and cap operations. GEM 5000 field readings were non-detect for methane at all 5 soil vapor points. SVP screening results are presented in Table 6 and SVP locations are illustrated on Figure 3.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7

Number of soil samples exceeding 915-1 7

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

Approximate areal extent (square feet) 285

NA / ND

ND Highest concentration of TPH (mg/kg) _____

_____ Highest concentration of SAR _____

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 5

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 BG01 - BG07 were collected from non-impacted native material adjacent to the wellhead at depths ranging from 0.5'-6' below ground surface (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 locations are illustrated on Figure 3.

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.

On 7/25/25, approximately 20 cubic yards of impacted soil was excavated and transported to the Kerr-McGee Land Treatment Facility located in Weld County, Colorado for recycling. 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.

Final 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 or 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

<input type="checkbox"/> Bioremediation (or enhanced bioremediation)	<input type="checkbox"/> Yes	Excavate and offsite disposal
<input type="checkbox"/> Chemical oxidation	<input type="checkbox"/> If Yes: Estimated Volume (Cubic Yards)	<u>20</u>
<input type="checkbox"/> Air sparge / Soil vapor extraction	<input type="checkbox"/> Name of Licensed Disposal Facility or ECMC Facility ID #	<u>149007</u>
<input type="checkbox"/> Natural Attenuation	<input type="checkbox"/> Excavate and onsite remediation	
<input type="checkbox"/> Other _____	<input type="checkbox"/> Land Treatment	
	<input type="checkbox"/> Bioremediation (or enhanced bioremediation)	
	<input type="checkbox"/> Chemical oxidation	
	<input type="checkbox"/> 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:

Approximately 20 cubic yards of impacted soil was excavated and transported to the Kerr-McGee Land Treatment Facility located in Weld County, Colorado for recycling.

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

E&P waste (solid) description Impacted soil

ECMC Disposal Facility ID #, if applicable: _____ 149007

Non-ECMC Disposal Facility: _____

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 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. 10/23/2025

Proposed date of completion of Reclamation. 10/23/2026

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. 02/04/2025

Actual Spill or Release date, or date of discovery. 05/27/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/28/2025

Proposed site investigation commencement. 05/28/2025

Proposed completion of site investigation. 08/04/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/27/2025

Proposed date of completion of Remediation. 08/04/2025

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

The previous Form 27-Supplemental (Document #404293696, submitted 7/25/25) is still in process with the ECMC.

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: 10/24/2025 _____

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: _____

Date: _____

Remediation Project Number: 39911 _____

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
404362886	FORM 27 DENIED
404388431	SITE MAP
404388432	SOIL SAMPLE LOCATION MAP
404388439	LABORATORY ANALYTICAL REPORT
404388441	LABORATORY ANALYTICAL REPORT
404388442	LABORATORY ANALYTICAL REPORT
404394167	LABORATORY ANALYTICAL REPORT
404394169	SOIL SAMPLE LOCATION MAP
404394172	SOIL SAMPLE LOCATION MAP
404394221	ANALYTICAL DATA SUMMARY TABLE(S)
404395002	PHOTO DOCUMENTATION
404655577	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 12 Files

General Comments

User Group	Comment	Comment Date
Environmental	ECMC has denied this Form and closure request. Operator has not collected an adequate number of samples to demonstrate impacts from spill ID 490352 have been removed.	05/12/2026

Total: 1 comment(s)