FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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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 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 INFORMATON

Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP Operator No: 47120
Address: P O BOX 173779
City: DENVER State: CO Zip: 80217-3779
Contact Person: Max Moran Email: DJRemediation_Forms@oxy.com

Phone Numbers
Phone: (720) 929-4307
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32373 Initial Form 27 Document #: 403545335

PURPOSE INFORMATION

- [ ] Rule 913.c.(1): Pit or Cuttings Trench closure.
- [X] Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- [X] 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.
- [X] 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: LOCATION Facility ID: 318753 API #: County Name: WELD
Facility Name: STATE OF COLORADO-63N67W 16CSW Latitude: 40.222230 Longitude: -104.899810
** correct Lat/Long if needed: Latitude: 40.222457 Longitude: -104.899480
QtrQtr: CSW Sec: 16 Twp: 3N Range: 67W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 488393 API #: County Name: WELD
Facility Name: St Co1, St16-11&12&14 Facility Latitude: 40.222457 Longitude: -104.899480
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: CSW Sec: 16 Twp: 3N Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Surface Water

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

St. Vrain River 400 feet (ft) west and Irrigation ditch 250 ft east. The site is located within a Mule Deer Migration Corridor, Mule Deer Severe Winter Range, Mule deer Winter Concentration Area, and within ¼ mile of the Aquatic Native Species Conservation Waters High Priority Habitat (HPH) areas, and within a 1/4 mile of a Bald Eagle 1/2 Mile Nest Buffer HPH boundary. Groundwater at approximately 3 ft below ground surface (bgs).

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [X] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	N/A	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	See attached data.	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 ST CO1, ST16-11&12&14 facility on August 29 and September 3, 2024. Groundwater was encountered in the facility excavation, beneath the liner, at approximately 5 ft bgs. Visual inspection and field screening of soil at two aboveground storage tanks (ASTs), one produced water vessel (PWV), three dumpline potholes, one meter house, one emission control device (ECD), and one separator were conducted following removal activities. Soil samples (AST01@0.5', AST02@1', PWV01-W01@3', PWV01-B01@5', SEP01-INLET@4', and SEP01-OUTLET@4') were submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. Initial laboratory analytical results indicated that polycyclic aromatic hydrocarbon (PAH) impacts exceeding the ECMC Table 915-1 allowable level were present at the AST02@1' location (above the liner). A verification sample was collected to confirm the initial results. Final results were within the Table 915-1 allowable level for all requested constituents and therefore a Form 19 Report was not submitted. Per updated ECMC guidance, verification sampling of organic exceedances is not considered valid. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 403943281) was submitted on October 3, 2024, and the ECMC issued Spill/Release Point ID 488393. The facility soil sample locations are depicted on Figure 1. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Between August 29 and November 6, 2024, excavation activities were conducted to address the impacts above the liner at the former tank battery. One confirmation soil sample (TB-B01@7') was collected from beneath the liner and submitted for analysis of the site-specific waste profile; however, all initial exceedances were subsequently cleared by background data, making the waste profile no longer valid. Additional sample volume was collected on July 31, 2025, and submitted for analysis of the constituents not previously included in the initial waste profile to achieve analysis of full list Table 915-1 constituents. Laboratory results were within the Table 915-1 allowable levels or within background levels x1.25 for Table 915-1 metals, verifying the integrity of the liner. The laboratory reports are attached.

Proposed Groundwater Sampling

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

On November 6, 2024, one groundwater sample (GW01@5') was collected from the tank battery excavation, beneath the liner, at a depth of 5 ft bgs. Groundwater was not in contact with impacted soil. The groundwater sample was submitted for analysis of full list Table 915-1 constituents in groundwater. Background groundwater samples [GW-BG03(TB)@3', GW-BG04(TB)@4', GW-BG05(TB)@5.5'] were collected for analysis of Table 915-1 inorganic constituents in groundwater. Based on the laboratory analytical results, groundwater concentrations were in compliance with ECMC Table 915-1 allowable levels or within background levels. No organic constituents were detected above the laboratory reporting limits. The groundwater sample location and background groundwater sample locations are depicted on Figure 1. 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):

On August 29 and September 3, 2024, visual inspections and field screening of soil were conducted at the hatch and loadout of AST01, the footprint and loadout of AST02, four sidewalls of the PWV excavation, three dumpline potholes, the ECD, and the 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. A photographic log is attached.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 8
Number of soil samples exceeeding 915-1: 7
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet): 2641

NA / ND

ND — Highest concentration of TPH (mg/kg):
-- — Highest concentration of SAR: 1.84
BTEX > 915-1: No
Vertical Extent > 915-1 (in feet): 7

Groundwater

Number of groundwater samples collected: 1
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet): 5
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?

[X] Were background samples collected as part of this site investigation?

One tank battery background sample (TB-BG01@0.5') was collected from the soil used to construct the tank battery. Due to excavation activities, the TB-BG sample is no longer being applied. Ten background soil samples were collected from native material outside of the facility excavations. Background 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. Laboratory analytical results indicate that EC, SAR, pH, arsenic, barium, lead, and selenium are naturally high in the native soil. The background soil sample laboratory analytical results are summarized in Table 2.

Three background groundwater samples were collected for analysis of Table 915-1 inorganic constituents in groundwater. The background groundwater sample results are summarized in Table 3.

The background soil and groundwater locations are depicted 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?

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.

Approximately 1200 barrels of non-impacted groundwater were removed from the site and transported to the Aggregate Recycle Facility in Weld County, Colorado for recycling. Approximately 1940 cubic yards of impacted soil were removed from the site and transported to the Front Range Landfill in Erie, Colorado for disposal. Disposal records are kept on file and are available upon request. The excavation area has been 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 PAH impacts above the tank battery liner have been remediated and all soil beneath the liner is within the ECMC Table 915-1 allowable levels or within background levels x1.25 for Table 915-1 metals. Groundwater was encountered in the tank battery excavation beneath the liner at approximately 5 ft bgs. Groundwater was not in contact with impacted soil. Analytical results indicate that groundwater concentrations were in compliance with ECMC Table 915-1 allowable levels or within background levels for all requested analytes. No organic constituents were detected above the laboratory reporting limits. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. As such, KMOG is requesting a No Further Action (NFA) determination for this location.

Soil Remediation Summary

☐ **In Situ**

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

☒ **Ex Situ**

Yes Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) 1940

Name of Licensed Disposal Facility or ECMC Facility ID # _____

No 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.

DENIED

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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

[X] Other NFA Status 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 1200 barrels of groundwater were removed from the site and transported to the Aggregate Recycle Facility in Weld County, Colorado for recycling.

Volume of E&P Waste (solid) in cubic yards 1940

E&P waste (solid) description Impacted Soil

ECMC Disposal Facility ID #, if applicable:

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

Volume of E&P Waste (liquid) in barrels 1200

E&P waste (liquid) description Non-Impacted Groundwater

ECMC Disposal Facility ID #, if applicable: 434766

Non-ECMC Disposal Facility:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

If YES:

[X] 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 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. 10/30/2025

Proposed date of completion of Reclamation. 10/30/2026

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. 10/02/2024

Actual Spill or Release date, or date of discovery. 10/02/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/29/2024

Proposed site investigation commencement. 08/29/2024

Proposed completion of site investigation. 07/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/29/2024

Proposed date of completion of Remediation. 07/31/2025

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

Verification sample results for the AST01@0.5', AST02@1', PWV01-W01@3', PWV01-B01@5', SEP01-INLET@4', and SEP01-OUTLET@4' sample locations have been omitted from the summary table and figure due to updated ECMC instructions. All verification sample results are included in the attached laboratory analytical reports.

Based on the analytical and soil screening data provided herein, assessment is complete, and Kerr-McGee is requesting an NFA determination for this location.

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: 10/30/2025 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: 32373

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
404397086	FORM 27 DENIED
404397145	LABORATORY ANALYTICAL REPORT
404397146	ANALYTICAL DATA SUMMARY TABLE(S)
404397147	PHOTO DOCUMENTATION
404397600	LABORATORY ANALYTICAL REPORT
404397603	LABORATORY ANALYTICAL REPORT
404397605	LABORATORY ANALYTICAL REPORT
404397608	LABORATORY ANALYTICAL REPORT
404401362	SOIL SAMPLE LOCATION MAP
404658746	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 10 Files

General Comments

User Group	Comment	Comment Date
Environmental	Soil sample "W.Wall" from Figure 1 does not appear on any analytical table. Incorrect color on that map? Is this supposed to be soil sample PWV01-W01@3'? Operator to explain.	05/13/2026
Environmental	Soil sample AST02@1' appears to exceed for 1-Methylnaphthalene and there is no apparent clean confirmation sample to clear it. Operator to explain or collect a clean confirmation sample in the vicinity of and deeper than impacts for full Table 915-1.	05/13/2026

Total: 2 comment(s)