FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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Report taken by: Grace Rollins

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 #: 29482 Initial Form 27 Document #: 403413817

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: TANK BATTERY Facility ID: 488806 API #: County Name: WELD
Facility Name: Megan H 16-18,20,21 Facility Latitude: 40.229169 Longitude: -104.670724
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NENW Sec: 16 Twp: 3N Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 490634 API #: County Name: WELD
Facility Name: Megan H 16-18,20,21 Facility Latitude: 40.229191 Longitude: -104.670846
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NENW Sec: 16 Twp: 3N Range: 65W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 490694 API #: County Name: WELD

Facility Name: Megan H 16-18, 20, 21 Facility Latitude: 40.229484 Longitude: -104.670832

** correct Lat/Long if needed: Latitude: Longitude:

QtrQtr: NENW Sec: 16 Twp: 3N Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications: SM

Most Sensitive Adjacent Land Use: Bald Eagle Roost Site HPH

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

The site is located within a ¼ mile of the boundary of a Bald Eagle Roost Site High Priority Habitat (HPH) area. No other potential receptors were identified within a ¼ mile radius of the site.

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
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 Megan H 16-18,20,21 Facility on 4/30 and 5/1/2025. Groundwater was not encountered in the facility excavations. Visual inspection and field screening of soil at two aboveground storage tanks (ASTs), one produce water vessel (PWV), three separators, three meter houses, and one emission control device (ECD) were conducted following removal activities. Soil samples (AST01@0.5', AST02@0.5', PWVB01@4', PWV-E01@2', SEP01-INLET@3', SEP01-OUTLET@4', SEP02-INLET@3', SEP02-OUTLET@4', SEP03-INLET@3', and SEP03-OUTLET@3') were submitted for analysis of full list Table 915-1 constituents including benzene, toluene, ethylbenzene (BTEX), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene (TMBs), naphthalene, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and Table 915-1 metals, to determine if a release occurred. Soil samples AST01, AST02, and PWV-E01 were collected above the tank battery liner and the PWV-B01 was collected below the liner. Initial laboratory analytical results indicated that pH and hexavalent chromium exceeding the Table 915-1 allowable levels and background levels were present at the AST01, SEP02-INLET, and SEP03-INLET locations. As such, Form 19 Initial Spill Reports (Doc #s 404220725 and 404224027) were submitted on 5/30 and 6/2/2025 & the ECMC issued Spill IDs 490634 and 490694. Additional background samples were applied and the separator samples were within Table 915-1 background levels x1.25 for Table 915-1 metals for hexavalent chromium. A verification sample was collected concurrently with the initial sample, but in separate laboratory provided bottles and was run for pH due to the immediate hold time of the analysis. Analytical results indicated that pH exceeding the Table 915-1 allowable level and background level is present at the PWV-B01 location.

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 4/30 and 5/1/2025, soil samples were collected from the former ASTs, PWV, and separators at depths ranging from 0.5 ft below ground surface (bgs) to 4 ft bgs. Soil samples AST01, AST02, and PWV-E01 were collected above the tank battery liner and the PWV-B01 was collected below the liner. The samples were submitted for analysis of full list Table 915-1 constituents. Initial results indicated that pH and hexavalent chromium exceeding the Table 915-1 allowable levels and background levels were present at the AST01, SEP02-INLET, and SEP03-INLET locations. Additional background samples were applied and the separator samples were within Table 915-1 background levels x1.25 for Table 915-1 metals for hexavalent chromium. A verification sample was collected concurrently with the initial sample and was run for pH due to the immediate hold time of the analysis. Results indicated that pH exceeding the Table 915-1 allowable level and background level is present at the PWV-B01 location.

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 4/30 and 5/1/2025, visual inspections and field screening of soil were conducted at the hatch, loadout, and/or base of each AST, three sidewalls of the PWV excavation, one ECD, and three meter house 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.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 11
Number of soil samples exceeeding 915-1: 11
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet): 294

NA / ND

ND — Highest concentration of TPH (mg/kg):
-- — Highest concentration of SAR: 3.17
BTEX > 915-1: No
Vertical Extent > 915-1 (in feet): 4

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?

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

One background soil sample (TB-BG01@0.5') was collected from the soil used to construct the tank battery & is no longer being applied. Eight background soil samples (NATIVE-BG13@3' - NATIVE-BG16@3' & NATIVE-BG13@6' - NATVE-BG16@6') were collected from the native material outside of the facility excavations. Thirty background samples were also collected as part of the Megan H 16-03 & Megan H 16-2J wellhead cut & cap activities (Rem #s 27839 & 28004), located approximately 580 ft north & 280 ft west, from similar depths (3',5', & 6' bgs), same land use, & NRCS soil type (Loamy Sand). Background soil samples were submitted for analysis of pH, EC, SAR, boron, & Table 915-1 metals using ECMC approved methods. Analytical results indicate that SAR, pH, arsenic, barium, cadmium, hexavalent chromium, lead, & 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 2.

[ ] Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards):
Volume of liquid waste (barrels):

[X] Is further site investigation required?

Assessment activities are on hold and expected to resume by 12/31/2026.

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 excavations 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 pH exceeding the ECMC Table 915-1 allowable level and background level remain in the AST01 and the PWV-B01 locations. Groundwater was not encountered during facility decommissioning activities.

Soil Remediation Summary

☐ **In Situ**

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

☐ **Ex Situ**

_____ 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.

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

[ ] 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: $ 17000

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: _____

REMEDIATION COMPLETION REPORT

REMEDIATION 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. 05/30/2025

Actual Spill or Release date, or date of discovery. 05/30/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/30/2025

Proposed site investigation commencement. 04/30/2025

Proposed completion of site investigation. 01/31/2027

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/30/2025

Proposed date of completion of Remediation. 01/31/2027

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 verification sample PWV-B01@4'-V in the attached figures and tables as the sample results identified an ECMC Table 915-1 exceedance (pH).

All other verification sample results have been omitted from the summary table and figures due to updated ECMC instructions. All verification sample results are included in the previously attached laboratory analytical reports.

No additional work has been done since the previous Form 27 submitted on 10/14/2025 (Document No. 404381904). The implementation schedule has been updated.

KMOG has a large number of active remediation projects and is working diligently to bring each project to closure. Field work for these projects is 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 due to the absence of hydrocarbons or other organic impacts in soil. The only ECMC Table 915-1 exceedance associated with this project is pH, groundwater was not encountered during facility decommissioning activities, and current land use is undeveloped/rangeland. Field work is anticipated to resume on the project by 12/31/2026.

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: 03/25/2026 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: 29482

DENIED

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
404494944	FORM 27-SUPPLEMENTAL-SUBMITTED
404580525	SOIL SAMPLE LOCATION MAP
404580526	SOIL SAMPLE LOCATION MAP
404580527	ANALYTICAL DATA SUMMARY TABLE(S)

Total Attach: 4 Files

General Comments

User Group	Comment	Comment Date
Environmental	ECMC has denied this form without technical review as Operator has provided no analytical or site investigation data showing progress of remediation of impacts documented at this location. Per Rule 912.a.(1-2): Operators will investigate, clean up, and document impacts resulting from Spills and Releases as soon as the impacts are discovered. Operator shall not delay execution of remedial or investigative actions while waiting for ECMC approval and may request expedited review if necessary. Operator shall conduct work in compliance with approved workplans and the 900 Series Rules. Operator shall provide a replacement form documenting investigation and clean up of these impacts; if a form providing this information is in process no replacement Form is due. If Operator is requesting a schedule change under Rule 913.d.(2) Operator shall attach adequate justification for the request. All ongoing/unaddressed comments/COAs from previous Forms remain applicable.	05/21/2026
Environmental	Operator submitted this form outside of the approved reporting schedule (Quarterly). In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days); additional violations may result in enforcement.	05/21/2026

Total: 2 comment(s)