

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

02/08/2019

Report taken by:

CHRIS CANFIELD

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 COGCC 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATION

Name of Operator: <u>KP KAUFFMAN COMPANY INC</u>		Operator No: <u>46290</u>	Phone Numbers
Address: <u>1675 BROADWAY, STE 2800</u>			Phone: <u>(303) 825-4822</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>	Mobile: <u>()</u>
Contact Person: <u>Susana Lara-Mesa</u>		Email: <u>slaramesa@kpk.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 12158Initial Form 27 Document #: 401839887

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste | <input type="checkbox"/> Rule 906.c.: Director request |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input checked="" type="checkbox"/> Other <u>Investigate allegations under complaint 200446391 and FIR 689500877</u> |

SITE INFORMATION

N Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>446608</u>	API #: <u></u>	County Name: <u>WELD</u>
Facility Name: <u>GRANT</u>		Latitude: <u>40.116700</u>	Longitude: <u>-104.967740</u>
		** correct Lat/Long if needed: Latitude: <u></u>	Longitude: <u></u>
QtrQtr: <u>NWNE</u>	Sec: <u>26</u>	Twp: <u>2N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use ResidentialIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 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	None	Lab Analysis
No	SOILS	None	Lab Analysis

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

KPK located the flowline closest to the sample collected by the complainant and drilled a boring to sample groundwater at 15' and soil at 17'. A sample for each was collected and tested for BTEX (water and soil) and TPH (soil). 6 additional 2" temporary piezometers will be drilled in order to collect samples and evaluate the current condition of the soil and groundwater. See proposed locations in map attached, which includes an upgradient piezometer. All piezometers will be marked. Field logs and soil description will be provided once the borings have been completed. Soil samples will be analyzed for BTEX and TPH. Groundwater, if encountered will be analyzed for BTEX, Sulfate, Chloride and TDS.

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):

Each temporary piezometer will have soil samples collected and analyzed for BTEX and TPH when drilled

Proposed Groundwater Sampling

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

Each temporary piezometer will have groundwater samples, if available, collected and analyzed for BTEX, Sulfate, Chloride and TDS. when drilled

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 1

Number of soil samples exceeding 910-1 0

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 0

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 14'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 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

0 Number of surface water samples exceeding 910-1

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?

☐ 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?

6 additional 2" temporary piezometers will be drilled in order to collect samples and evaluate the current condition of the soil and groundwater. See proposed locations in map attached, which includes an upgradient piezometer. All piezometers will be marked. Field logs and soil description will be provided once the borings have been completed. Soil samples will be analyzed for BTEX and TPH. Groundwater, if encountered will be analyzed for BTEX, Sulfate, Chloride and TDS.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

There is no contamination to be removed at the moment

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.

There is no remediation required at the moment

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 COGCC 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

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other TBD

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☐ Other _____

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 _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

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

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? _____

Does Groundwater meet Table 910-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

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.

No reclamation is necessary at this point

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 approve the seed mix? _____

If NO, does the seed mix comply with local soil conservation district recommendations? _____

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 02/08/2019

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/14/2018

Date of commencement of Site Investigation. 11/26/2018

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Susana Lara-Mesa

Title: VP Engineering

Submit Date: 02/08/2019

Email: slaramesa@kpk.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: CHRIS CANFIELD

Date: 02/20/2019

Remediation Project Number: 12158

COA Type

Description

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Attachment Check 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

401904728	FORM 27-SUPPLEMENTAL-SUBMITTED
401904951	ANALYTICAL RESULTS
401905568	SOIL SAMPLE LOCATION MAP
401905569	SITE MAP
401933258	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>The operator's Final Closure Request is denied and the subject Supplemental Form 27 is being returned to draft status for revision by the operator.</p> <p>The following activities and information are required to complete the subject site investigation:</p> <ol style="list-style-type: none"> 1.Construction of an array of temporary piezometers to determine the extent of ground water contamination and evaluate all potential sources (e.g. the dump line to the fiberglass partially buried vessel, other active lines, and historically abandoned lines). 2.At least one up-gradient temporary piezometer must be installed to provide background groundwater conditions. 3.Install a marker identifying a surface water gauging and sampling station on the eastern bank of the unnamed stream adjacent to the western side of the site. Provide GPS coordinates and reference elevation for the surface water station. 4.Field logs, including USCS soil descriptions and field screening results, for all borings. 5.All soil samples shall be analyzed for BTEX and TPH. 6.All soil samples analyzed for TPH shall be tested for both total volatile and extractable hydrocarbons (C6-C35). 7.All groundwater samples shall be analyzed for a minimum of BTEX, Sulfate, Chloride, & TDS. 8.Construction diagrams, including the reference elevations, for all temporary piezometers. 9.A site map showing all soil, ground water, and surface water sampling locations. 10.A potentiometric map depicting ground water flow direction and gradient. 11.Detailed reporting of ground water sampling procedures (e.g. gauging data, field parameters, volume of ground water purged). 12.Tables summarizing ground water and surface water gauging data, analytical results for soils, analytical results for ground water, and analytical results for surface water. 13.Perform an integrity test on the partially buried fiberglass produced water vessel. 14.Submit records demonstrating compliance with COGCC 1104 series rules. 15.All work must be performed by a qualified environmental technician experienced in USCS logging of soil borings, field screening methods, monitor well/piezometer construction and soil, ground water, and surface water sampling. 16.No later than 10-days after receipt of this comment, submit a proposed soil boring location diagram via Supplemental Form 27 for COGCC approval prior to proceeding with work. 17.Provide a minimum of 72-hrs notice to COGCC area EPS prior to performing field work so they can witness assessment work. 18.Complete additional site assessment and provide results no later than 45-days from receipt of this comment. 19.Coordinate all additional site assessment activities with the surface owner or their representative. 20.Include date(s) of Surface Owner notification/consultation in the Form 27 Implementation Schedule. 	01/31/2019

Total: 1 comment(s)