

State of Colorado Oil and Gas Conservation Commission

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401234505

Receive Date:

04/28/2020

Report taken by:

Jim Hughes

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>KINDER MORGAN CO2 CO LP</u>	Operator No: <u>46685</u>	Phone Numbers Phone: <u>(970) 882-5532</u> Mobile: <u>(970) 403-9501</u>
Address: <u>1001 LOUISIANA ST SUITE 1000</u>		
City: <u>HOUSTON</u>	State: <u>TX</u> Zip: <u>77002</u>	
Contact Person: <u>Michael Hannigan</u>	Email: <u>CO2Source_Permitting@kindermorgan.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9885 Initial Form 27 Document #: 200440458

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 checked="" 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 checked="" 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>Evaluation of former drilling pit area.</u> |

SITE INFORMATION

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>313616</u>	API #: _____	County Name: <u>MONTEZUMA</u>
Facility Name: <u>GOODMAN POINT (GP#15)-N36N17W 18NWNE</u>		Latitude: <u>37.383820</u>	Longitude: <u>-108.761530</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>18</u>	Twp: <u>36N</u>	Range: <u>17W</u> Meridian: <u>N</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Non-irrigated agricultural

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? No

Other Potential Receptors within 1/4 mile

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	SOILS	None	Soil sample collection and laboratory 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.

Initial actions included conducting a review of water well databases to identify water wells within 1/2 mile of the location and preparing a scope of work for the assessment of the former drilling pit.

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):

Proposed Groundwater Sampling

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

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 24

Number of soil samples exceeding 910-1 5

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

Approximate areal extent (square feet) 6000

NA / ND

-- Highest concentration of TPH (mg/kg) 12

-- Highest concentration of SAR 35.7

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 2

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 910-1

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA 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?

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.

Waste remaining in place meets Table 910-1 screening levels and/or criteria described in COGCC 2008 Rulemaking Frequently Asked Questions (#32) related to depth of clean cover with five (5) minor exceptions. The pH values of soil samples collected from depths shallower than 3' BGS exceeded the Table 910-1 screening level of 9.0 (B2=9.44, B3=9.06, B4=9.28, B6=9.17, B8=9.20).

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.

The site assessment conducted at this former drilling pit location shows that there is no impact to soil above Table 910-1 screening levels except where acceptable based on COGCC 2008 Rulemaking Frequently Asked Questions (#32) related to depth of cover over waste left in place with five (5) minor exceptions as noted above. Since the pH values of the five (5) shallow soil samples collected at the site ranged between 9.06 and 9.44 (Table 910-1 SL = 9.0) and the winter wheat crops cultivated above the former pit have been unaffected by the pH values, we are not proposing further remedial activity for shallow soil at this location. Kinder Morgan has recently received approval to leave the buried pit liner in place at this location (see Doc #402363516) therefore we are requesting closure of Remediation Project #9885.

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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

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: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

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

Do all soils meet Table 910-1 standards? No _____

Does the previous reply indicate consideration of background concentrations? _____

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? No _____

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.

This site is currently used for non-irrigated crop cultivation with the current and previous growing seasons planted in winter wheat.

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 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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____ 05/02/2016

Date of commencement of Site Investigation. _____ 11/16/2016

Date of completion of Site Investigation. _____ 02/08/2017

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

Pit liner was encountered in a single soil boring (B7 at a depth of 6' BGS) advanced at this site and several small pieces of pit liner were observed on the ground surface. Kinder Morgan has obtained a waiver from the landowner granting permission to leave any portions of the liner currently in the subsurface to remain in place and facilitated the recording of a restrictive notice on the property. Kinder Morgan has recently received a variance to COGCC Rule 905.b.(3)A - Disposal of Pit Liner and at this time we are requesting closure of Remediation Project #9885.

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

Signed: Michael Hannigan

Title: EHS Supervisor

Submit Date: 04/28/2020

Email: michael_hannigan@kindermorgan.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: Jim Hughes

Date: 05/07/2020

Remediation Project Number: 9885

COA Type**Description**

	After review of the data presented, elevated levels of [SAR/EC/pH] exist deeper than three feet below ground surface. Per guidance in FAQ 32, elevated levels of [SAR/EC/pH] at three feet below ground surface or deeper should not adversely affect the successful reclamation of the site. If groundwater is found to be impacted, or if reclamation is not compliant with the 1000-series rules, additional remediation activities may be required at the site. It appears that no further action is necessary at this time and COGCC approves the closure request.
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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**

401234505	FORM 27-SUPPLEMENTAL-SUBMITTED
401234581	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

Environmental	As stated in the response to FAQ #31, "an operator need not meet a concentration level specified in Table 910-1 if the operator can demonstrate to the COGCC's satisfaction that the Table 910-1 level is exceeded by the background level in the native soils or ground water, as applicable." The operator shall provide background concentration levels to demonstrate native exceedances of Table 910-1 along with a formal request for relief from the elevated contaminants of concerns. The operator shall then be required to meet the concentration levels determined to exist in the native soil/groundwater, with prior approval by the COGCC.	05/07/2020
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Total: 1 comment(s)