

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
402490054
Receive Date:
09/16/2020

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
Address: <u>1001 LOUISIANA ST SUITE 1000</u>		Phone: <u>(970) 882-5532</u>
City: <u>HOUSTON</u> State: <u>TX</u> Zip: <u>77002</u>		Mobile: <u>(970) 403-9501</u>
Contact Person: <u>Michael Hannigan</u>	Email: <u>CO2Source_Regulatory@kindermorgan.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 9666 Initial Form 27 Document #: 200439556

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 checked="" 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 type="checkbox"/> Other _____

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>313620</u>	API #: _____	County Name: <u>MONTEZUMA</u>
Facility Name: <u>GOODMAN POINT (GP #13)- N37N17W 32SESE</u>		Latitude: <u>37.413710</u>	Longitude: <u>-108.738230</u>
QtrQtr: <u>SESE</u> Sec: <u>32</u> Twp: <u>37N</u>		Range: <u>17W</u>	Meridian: <u>N</u> Sensitive Area? <u>Yes</u>

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

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes 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:

- | | | |
|----------------------------------------------------------|------------------------------------------------------------|--------------------------------------------------------------|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | Drilling pit liner _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input checked="" type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) _____ | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	TPH > Table 910-1	Soil sample collection & 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 a 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):

After the proposed remediation activities have been completed, a soil sample will be collected from the location of soil boring #7 at a depth of 10' to 11' below ground surface where the TPH concentration in a soil sample collected on 8/24/2020 exceeded the Table 910-1 screening level of 500 mg/kg.

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 31
Number of soil samples exceeding 910-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1200

NA / ND

-- Highest concentration of TPH (mg/kg) 3590
-- Highest concentration of SAR 259
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 1

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 44'
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?

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.

Soil samples were collected at the GP-13 site on 8/24/2020 to verify successful remediation of TPH, EC and SAR impacts to soil. The 2020 sample collection and laboratory analyses showed that the EC and SAR impacts to soil <3' below ground surface in the areas of soil borings #1, #2, #3, #5 and #6, as documented in the site characterization report, were successfully remediated. However, the TPH concentration in the soil sample collected from soil boring #7 at a depth of 10' to 11' below ground surface exceeded the Table 910-1 standard (3,590 mg/kg). All other waste remaining in place meets Table 910-1 standards and/or criteria described in COGCC 2008 Rulemaking Frequently Asked Questions (#32) related to depth of clean cover.

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.

Remediation of TPH in soil surrounding soil boring #7 will be remediated by the subsurface application of liquid chemical oxidant (chem-ox injection) at a depth of 10' to 11' below ground surface. The proposed remediation schedule is being developed and is based on contractor availability. Remediation of soil to TPH concentrations less than the current Table 910-1 standard of 500 mg/kg will take approximately 18 to 24 months and will be verified by soil sample collection and laboratory analysis. After the proposed remediation activities have been completed, a soil sample will be collected from the location of soil boring #7 at a depth of 10' to 11' below ground surface where the TPH concentration in a soil sample collected on 8/24/2020 exceeded the Table 910-1 standard of 500 mg/kg.

Soil Remediation Summary

In Situ

Ex Situ

Yes _____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

Yes _____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

No _____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

No _____ Natural Attenuation

_____ Excavate and onsite remediation

No _____ Other _____

_____ 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? No _____

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.

The site is currently in interim reclamation status (crop production). The landowner and tenant were advised of both the subsurface oxidant injection and surface soil amendment application. Both treatments took place after crops were harvested, which did not adversely disturb the soil conditions in the areas of soil borings #1, #2, #3, #4, #5, #6 and #7. Photos of the 2020 bean crop growing in the interim reclamation area are attached to this Form 27. The location will continue to be included in Kinder Morgan's noxious weed prevention program.

Is the described reclamation complete? Yes _____

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? Yes _____

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

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 03/02/2017

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. 11/19/2016

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

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/23/2017

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. 11/20/2017

Date of completion of Reclamation. _____

OPERATOR COMMENT

Non-E&P waste (pit liner) was observed in one soil boring advanced at the GP-13 site. The drilling pit at the GP-13 location was closed prior to April 1, 2009 and, as documented in the Rule 523.e. Voluntary Self Disclosure Eleventh and Twelfth Quarterly Reports, the GP-13 site does not require a variance to Rule 905. A written agreement with the landowner to leave the pit liner in place is attached to this Form 27.

On 8/24/2020, soil samples were collected from the same locations and depths of the former drilling pit where EC and SAR values in soil <3' below ground surface exceeded the Table 910-1 standards (soil borings #1, #2, #3, #5 and #6) and where the TPH concentrations in soil exceeded the Table 910-1 standard (soil borings #4 and #7) during site characterization soil sampling. The purpose of soil sample collection on 8/24/2020 was to verify the success of soil remediation (chemical oxidant injection for TPH and calcium soil amendment for EC and SAR) at the GP-13 site. The laboratory analytical reports (attached) show the current EC and SAR values in soil borings #1, #2, #3, #5 and #6 less than 3' below ground surface and the current TPH concentration in soil boring #4 to be less than COGCC Table 910-1 standards. The current TPH concentration in soil boring #7 at 10' to 11' below ground surface is 3,590 mg/kg.

Regarding the former drilling pit at the GP-16 production well location, Kinder Morgan submits that the attached landowner agreement and the attached laboratory analytical data from the 2020 re-sampling of soil borings #1, #2, #3, #4, #5 and #6 show that the only remedial action required to close remediation project #9666 is the proposed chem-ox injection and verification sampling at soil boring #7 at 10' to 11' below ground surface.

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: 09/16/2020 _____

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: 09/29/2020 _____

Remediation Project Number: 9666 _____

COA Type**Description**

COA Type	Description

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**

402490054	FORM 27-SUPPLEMENTAL-SUBMITTED
402490183	PHOTOS
402490185	SURFACE USE AGREEMENT
402490186	ANALYTICAL RESULTS
402490187	ANALYTICAL RESULTS

Total Attach: 5 Files

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

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)