

# State of Colorado Oil and Gas Conservation Commission

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



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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>	<b>Phone Numbers</b>
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>
Contact Person: <u>Michael Hannigan</u>	Email: <u>CO2Source_Regulatory@kindermorgan.com</u>	Mobile: <u>(970) 882-5521</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 9887 Initial Form 27 Document #: 200440461

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

#### SITE INFORMATION

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>313601</u>	API #: _____	County Name: <u>MONTEZUMA</u>
Facility Name: <u>YE (YELLOW JACKET)-N37N18W 2NWNW</u>		Latitude: <u>37.497860</u>	Longitude: <u>-108.809195</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>2</u>	Twp: <u>37N</u>	Range: <u>18W</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

Drilling pit liner

☐ 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
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 remediation activities have been completed, soil samples will be collected from the same areas of the former drilling pit where TPH concentrations exceeded Table 910-1 screening levels during site characterization soil sampling.

### 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 3

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

Approximate areal extent (square feet) 2400

### NA / ND

-- Highest concentration of TPH (mg/kg) 11000

-- Highest concentration of SAR 126

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

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 the exception of TPH concentrations found in two (2) soil samples collected from Boring #2 (11,000 mg/kg & 2,100 mg/kg) and one soil sample from Boring #8 (580 mg/kg).

## 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 existing TPH impacts will be accomplished through the subsurface application of chemical oxidation compounds in the specific areas of impact identified in the site characterization report. The proposed in-situ remediation technology involves a combination of controlled chemical oxidation and subsequent accelerated biodegradation. The remediation process uses hydrogen peroxide generated from solid peroxygens injected into the soil in an aqueous suspension which eliminates the creation of heat and produces a controllable chemical reaction. The proposed treatment at each soil boring (YE-7-2 and YE-7-8) would involve 55 direct push injection points advanced to the target depths on a 6-foot by 6-foot grid. 74 gallons of oxidation chemical will be introduced to the subsurface at each injection point for soil boring YE-7-2 and 37 gallons for soil boring YE-7-8. The proposed remediation schedule includes chemical injection during the month of October 2017 with attainment of TPH concentrations less than Table 910-1 screening levels within 24 months verified by soil sample collection and laboratory analysis.

## Soil Remediation Summary

☒ In Situ

Yes Bioremediation ( or enhanced bioremediation )

Yes Chemical oxidation

No Air sparge / Soil vapor extraction

No 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? Yes \_\_\_\_\_

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 YE-7 well was plugged and abandoned in August 2017. The entire location and access road were re-graded and seeded (final reclamation) in December 2017. The area of the site where the former drilling pits are located has been in interim reclamation for several years and was not disturbed during final reclamation activities. Vegetation growth will be monitored until the required vegetation cover is achieved and 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. 03/14/2017

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. 11/01/2016

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

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 10/19/2017

Date of completion of Remediation. 08/25/2020

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. 12/04/2017

Date of completion of Reclamation. 12/18/2017

**OPERATOR COMMENT**

Non-E&P waste (pit liner) was observed in four soil borings advanced at the YE-7 site. A Rule 905.b.(3)A variance request for disposal of pit liner was submitted to COGCC via Form 4 (Doc #402363544) on 4/6/2020 and approved on 4/27/2020.

The subsurface chemical oxidation injection described in the Remedial Action Plan of this Form 27 took place in October 2017. As stated in the Site Investigation Plan section of this Form 27, soil samples were collected from the same locations and depths (soil borings 2 & 8) of the former drilling pit where TPH concentrations in soil between 7' and 15' below ground surface exceeded the Table 910-1 screening level of 500 mg/kg during site characterization soil sampling. The laboratory analytical report of soil samples collected on August 25, 2020 (attached) at the YE-7 site shows that current TPH concentrations are <30 mg/kg at all of the depths sampled in soil borings 2 and 8.

Regarding the former drilling pit at the YE-7 production well location, Kinder Morgan submits that the attached Notice of Environmental Use Restrictions and laboratory analytical data from the 2020 re-sampling of soil borings 2 and 8 provide sufficient documentation to close Remediation Project #9887.

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: 09/14/2020

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: 10/02/2020

Remediation Project Number: 9887

**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.
	Surface disturbances shall be reclaimed in accordance with the 1000 Series Reclamation Regulations. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation.

**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**

402487863	FORM 27-SUPPLEMENTAL-SUBMITTED
402487950	ANALYTICAL RESULTS
402487964	OTHER

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)