

State of Colorado Oil and Gas Conservation Commission

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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>	Phone Numbers
Address: <u>1001 LOUISIANA ST SUITE 1000</u>		Phone: <u>(970) 882-5537</u>
City: <u>HOUSTON</u>	State: <u>TX</u>	Zip: <u>77002</u>
Contact Person: <u>Jenna Emerick</u>	Email: <u>CO2Source_Regulatory@kindermorgan.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9837 Initial Form 27 Document #: 200440344

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 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>322131</u>	API #: _____	County Name: <u>DOLORES</u>
Facility Name: <u>DOE CANYON-N40N17W 18NWNW</u>		Latitude: <u>37.731550</u>	Longitude: <u>-108.779470</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>18</u>	Twp: <u>40N</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

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	EC & pH < 3' BGS, 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 were completed, soil samples were collected from the same locations and depths of the former drilling pit where EC, pH & TPH values exceeded Table 910-1 standards 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 27

Number of soil samples exceeding 910-1 3

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

Approximate areal extent (square feet) 3600

NA / ND

-- Highest concentration of TPH (mg/kg) 448.3

-- Highest concentration of SAR 51.3

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 3

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

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

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 EC in B6 & B7, pH in B6, and TPH in 1 soil sample collected from B3 (880 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 was accomplished through natural biodegradation. The proposed remediation schedule included attainment of TPH concentrations less than Table 910-1 screening levels within 24 months which was verified by soil sample collection and laboratory analysis. Remediation of EC & pH in soil less than 3' bgs in the areas surrounding B6 & B7 was accomplished by surface application of a calcium soil amendment (gypsum). The proposed remediation schedule called for soil amendment application during the month of November 2017 with attainment of EC & pH concentrations less than Table 910-1 screening levels in 18 to 24 months verified by soil sample collection and laboratory analysis.

Soil Remediation Summary

☒ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
Yes Natural Attenuation
Yes Other Surface application of calcium
soil amendment (gypsum) _____

☐ 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 DC-2 location is currently in interim reclamation status. The soil amendment was applied under a portion of the existing gravel well pad in the areas of soil borings B6 and B7. Soil samples have been collected from the slopes adjacent to the well pad on the north, east and south sides and analyzed for nutrient deficiencies and the presence of herbicides. Additional soil amendments were applied and those areas were re-seeded in the Spring of 2018. The proposed seed mix used at the location was approved by the landowner. 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. _____

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. _____ 11/04/2016

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

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____ 11/17/2017

Date of completion of Remediation. _____ 08/26/2020

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____ 04/02/2018

Date of completion of Reclamation. _____

OPERATOR COMMENT

Non-E&P waste (pit liner) was observed in two soil borings advanced at the DC-2 site. The drilling pit at the DC-2 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 DC-2 site does not require a variance to Rule 905. A written agreement with the landowner to leave the pit liner in place has been attached to this form.

As stated in the Site Investigation Plan section of this Form 27, soil samples were collected from the same locations and depths (soil borings 3, 6, and 7) of the former drilling pit where pH and EC values in soil <3' below ground surface and TPH concentrations exceeded the Table 910-1 screening levels during site characterization soil sampling. The laboratory analytical reports (attached) show the current EC concentration to be 1.650 mmhos/cm and pH value to be 7.68 at soil boring 6, the EC concentration to be 2.300 mmhos/cm at soil boring 7, and the TPH concentration to be 448.3 mg/kg at soil boring 3, all of which meet the respective COGCC Table 910-1 standards.

Regarding the former drilling pit at the DC-2 production well location, Kinder Morgan submits that the analytical data from the re-sampling of soil borings 3, 6, and 7 provide sufficient documentation to verify completion of soil impact remediation. Kinder Morgan submits the written landowner agreement allowing the pit liner to remain in place via Form 27 and requests closure of Remediation Project #9837.

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

Signed: Jenna Emerick

Title: EHS Specialist

Submit Date: 12/01/2020

Email: jenna_emerick@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: 12/08/2020

Remediation Project Number: 9837

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**

402489024	FORM 27-SUPPLEMENTAL-SUBMITTED
402489562	ANALYTICAL RESULTS
402489567	ANALYTICAL RESULTS
402543916	WAIVERS

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)