

State of Colorado  
Oil and Gas Conservation Commission

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402649642  
Receive Date:  
04/06/2021

Report taken by:  
PETER GINTAUTAS

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>	<b>Phone Numbers</b> Phone: <u>(303) 8254822</u> Mobile: <u>( )</u>
Address: <u>1675 BROADWAY, STE 2800</u>		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		
Contact Person: <u>Jeff Rickard</u> Email: <u>jrickard@kpk.com</u>		

PROJECT, PURPOSE & SITE INFORMATION

<b>PROJECT INFORMATION</b>	
Remediation Project #: <u>15797</u>	Initial Form 27 Document #: <u>402458531</u>
<b>PURPOSE INFORMATION</b>	
<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 checked="" type="checkbox"/> Other <u>Quarterly Update</u>
<b>SITE INFORMATION</b> <u>N</u> Multiple Facilities ( in accordance with Rule 909.c. )	
Facility Type: <u>SPILL OR RELEASE</u> Facility ID: <u>476987</u> API #: _____ County Name: <u>WELD</u>	
Facility Name: <u>NESSSU CONSOLIDATION</u> Latitude: <u>40.129619</u> Longitude: <u>-104.798581</u>	
** correct Lat/Long if needed: Latitude: _____ Longitude: _____	
QtrQtr: <u>NWNE</u> Sec: <u>20</u> Twp: <u>2N</u> Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>	
<b>SITE CONDITIONS</b>	
General soil type - USCS Classifications <u>SM</u>	Most Sensitive Adjacent Land Use <u>Cropland</u>
Is domestic water well within 1/4 mile? <u>Yes</u>	Is surface water within 1/4 mile? <u>Yes</u>
Is groundwater less than 20 feet below ground surface? <u>Yes</u>	
<b>Other Potential Receptors within 1/4 mile</b>	

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input checked="" 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 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	Unknown	Undetermined

## 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 was notified of a flowline release on 6/20/2020 by the surface owner's tenant farmer. Entire flowline system was shut-in on 6/20/2020 in response to the notification. Release occurred in a corn field affecting at least one row of corn in the field. Initial excavation and hydrovac??ing was preformed to remove any pooled liquids present at the time of response to the flowline release notification. Based on historical release information, release has occurred at the location of spill/release point 470915 & REM project #15409.

## 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 ):

Final vertical and horizontal extent of the excavation will be based on results from collected grab soil samples. all soil Samples will be analyzed for TPH, DRO, GRO, ORO, BTEX, pH, EC, and SAR and verified complaint with COGCC Table 910-1. At a minimum, one grab sample will be collected from each excavation wall as well as from the base of the excavation area.

### 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     0      
Number of soil samples exceeding 910-1           
Was the areal and vertical extent of soil contamination delineated?           
Approximate areal extent (square feet)         

### NA / ND

         Highest concentration of TPH (mg/kg)           
         Highest concentration of SAR           
         BTEX > 910-1           
         Vertical Extent > 910-1 (in feet)         

### 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         

         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  
         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?

Grab samples to be collected from the point of release and post excavation of impacted soils.

# 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.

All impacted soil will be excavated and hauled to a certified disposal location.

## REMEDICATION 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.

Excavation will be performed to remove all impacted soil. Impacted soil will be disposed of at the Front Range Landfill in Erie, CO. If groundwater is found to be impacted, a groundwater monitoring plan will be submitted for review and approval to address groundwater known impacts.

## Soil Remediation Summary

### In Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

### Ex Situ

- Yes \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 50
- \_\_\_\_\_ 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.

Groundwater does not appear to be impacted. If groundwater is encountered during excavation of impacted soils, groundwater investigation will occur - One (1) groundwater sample will be collected and analyzed for BTEX.

# 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? \_\_\_\_\_

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? \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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.

Excavation area will be backfilled with clean fill dirt. Top layer of backfill will be screened topsoil suitable for crop growth. Disturbed area will be recontoured, ripped and prepared for field plowing and planting activities.

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

If NO, does the seed mix comply with local soil conservation district recommendations? No \_\_\_\_\_

# 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). 06/21/2020

Date of commencement of Site Investigation. 06/21/2020

Date of completion of Site Investigation. \_\_\_\_\_

## **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 07/01/2020

Date of completion of Remediation. \_\_\_\_\_

## **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

This form is being submitted as the quarterly update required by rule. Currently Project#15797, the Nessu Consolidation Line, has been repaired and is waiting on a pressure test to confirm. The excavation is currently open and is being worked to determine the extents of the impacted soil.

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

Signed: ` Jeff Rickard \_\_\_\_\_

Title: Regulatory \_\_\_\_\_

Submit Date: ` 04/06/2021 \_\_\_\_\_

Email: jrickard@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: PETER GINTAUTAS \_\_\_\_\_

Date: 04/06/2021 \_\_\_\_\_

Remediation Project Number: 15797 \_\_\_\_\_

**Condition of Approval****COA Type****Description**

	Corrective actions required by flowline integrity inspection document 690101949 performed 06/29/2020 are required to be completed before flowline may be utilised.
	Submit reports of site investigation and progress of remediation including site map, analytical summary including photo logs, field screening data and analytical reports of sampling and analysis at a minimum on a quarterly basis until further site investigation activities show that the vertical and horizontal extent of impacts to soil impacts have been established.
2 COAs	

**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**

402649642	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)