

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

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Report taken by:

CHRIS CANFIELD

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 12158Initial Form 27 Document #: 401839887

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 checked="" type="checkbox"/> Other <u>Quarterly Update</u> |

SITE INFORMATION

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

| | | | |
|--|----------------------------|-------------------------------|---|
| Facility Type: <u>TANK BATTERY</u> | Facility ID: <u>446608</u> | API #: <u></u> | County Name: <u>WELD</u> |
| Facility Name: <u>GRANT</u> | Latitude: <u>40.116700</u> | Longitude: <u>-104.967740</u> | |
| ** correct Lat/Long if needed: Latitude: <u></u> | | Longitude: <u></u> | |
| QtrQtr: <u>NWNE</u> | Sec: <u>26</u> | Twp: <u>2N</u> | Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use ResidentialIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

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 | GROUNDWATER | Unknown | Lab Analysis |
| Yes | SOILS | Unknown | Lab 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.

KPK located the flowline closest to the sample collected by the complainant and drilled a boring to sample groundwater at 15' and soil at 17'. A sample for each was collected and tested for BTEX (water and soil) and TPH (soil). 6 additional 2" temporary piezometers will be drilled in order to collect samples and evaluate the current condition of the soil and groundwater. See proposed locations in map attached, which includes an upgradient piezometer. All piezometers will be marked. Field logs and soil description will be provided once the borings have been completed. Soil samples will be analyzed for BTEX and TPH. Groundwater, if encountered will be analyzed for BTEX, Sulfate, Chloride and TDS.

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 0

Number of soil samples exceeding 910-1

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet)

NA / ND

NA Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet)

Groundwater

Number of groundwater samples collected 5

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 7'

Number of groundwater monitoring wells installed 6

Number of groundwater samples exceeding 910-1 5

-- Highest concentration of Benzene (µg/l) 76

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

1 Number of surface water samples collected

1 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?

Based on measured groundwater elevations, monitoring well MW-1 is upgradient. Consequently, chlorides, sulfates and TDS concentrations in the samples collected from monitoring well MW-1 are considered to be background concentrations for this monitoring period.

☐ 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?

Additional groundwater monitoring well is needed to be installed north of Godding Hollow Parkway in order to delineate groundwater impacts north of the historical release.

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.

KPK will begin excavation using known points of contamination based on February 25, 2019 samples from exploratory borings. KPK will continue soil excavation until horizontal extent of contamination is determined. Excavation activities will continue based on the results field screening results from ambient temperature head space measurements within the excavation area. All contaminated soil will be removed from the location. Vertical extent is believed to be below groundwater level. Because of the depth of excavation limits groundwater will have, contaminated soil will be removed down to groundwater level.

REMEDIAL 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.

Following the removal of contaminated soil, grab samples will be collected to verify the completion of excavation activities. Analysis for grab samples included TPH -DRO, GRO & ORO, BTEX, pH, EC, and SAR. Upon verification that sample concentrations are below Table 910-1 thresholds, the excavation area will be backfilled with clean fill dirt. A groundwater monitoring plan will be submitted in a Supplemental Form 27 to address known groundwater contamination. Groundwater monitoring plan will include placement of piezometers, frequency of sampling, analysis of samples, and potential groundwater treatment timeline.

Remedial actions of impacted soil will commence on May 6, 2020 and will conclude as soon as practicable pending availability of necessary resources (e.g., dump trucks). Upon completion of the removal of impacted soil, impact to groundwater will be delineated to the north, east and south. If excavation activities require the removal of currently installed monitoring wells to the west, quarterly groundwater sampling and reporting will be suspended until monitoring wells can be reinstalled.

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) _____ 3065

_____ 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 monitoring plan will be provided via supplemental Form 27 upon the completion contaminated soil excavation. Groundwater will continued to be sampled on a quarterly basis with the existing groundwater monitoring wells. Groundwater sampling will continue until monitoring wells are removed for excavation activities.

11/02/2020 Update - In an effort to delineate groundwater impacts, a monitoring well needs to be installed upgradient of MW-2. A map with the proposed location of the new monitoring well has been provided.

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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

None

Volume of E&P Waste (solid) in cubic yards 3065

E&P waste (solid) description Impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Front Range Landfill

Volume of E&P Waste (liquid) in barrels 3440

E&P waste (liquid) description Impacted groundwater

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: NGJ Water Disposal Solutions

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? No

Is additional groundwater monitoring to be conducted? Yes

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.

Area disturbed outside tank battery location be re-contoured to match surrounding contour, ripped and reseeded. Area within tank battery location will be reconstructed for operational use.

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? _____

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. 02/08/2019

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/14/2018

Date of commencement of Site Investigation. 11/26/2018

Date of completion of Site Investigation. 05/07/2020

REMEDIAL ACTION DATES

Date of commencement of Remediation. 05/06/2020

Date of completion of Remediation. 08/27/2021

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

This form is being submitted as a quarterly update for remediation project #12158. KPK is currently still excavating the location to determine the extent of the contamination. Currently KPK believes it has found the eastern extent of the contamination and is working the excavation to the west. Due to the large size of the excavation, KPK has begun to back fill the eastern portion of the excavation.

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: 03/25/2021

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: CHRIS CANFIELD

Date: 04/21/2021

Remediation Project Number: 12158

Condition of Approval

COA Type

Description

| | |
|--------|--|
| | Operator will submit a specific implementation schedule in accordance with Rule 901.d.(1). |
| | Per Rule 913.d.(2) Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule at least 14 days in advance of any schedule changes. |
| 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

| | |
|-----------|--------------------------------|
| 402640251 | FORM 27-SUPPLEMENTAL-SUBMITTED |
|-----------|--------------------------------|

Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)