

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402842304

Receive Date:

Report taken by:

## 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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

### OPERATOR INFORMATION

Name of Operator: <u>KP KAUFFMAN COMPANY INC</u>	Operator No: <u>46290</u>	<b>Phone Numbers</b>
Address: <u>1675 BROADWAY, STE 2800</u>		Phone: <u>(303) 8254822</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Ray Gorka</u>	Email: <u>rgorka@kpk.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 19616 Initial Form 27 Document #: 402762330

#### PURPOSE INFORMATION

- ☐ Rule 913.c.(1): Pit or Cuttings Trench closure.
- ☐ Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- ☒ Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- ☐ Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- ☐ Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- ☐ Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- ☐ Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- ☐ Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- ☐ Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- ☐ Rule 913.g: Changes of Operator.
- ☐ Rule 915.b: Request to leave elevated inorganics in situ.
- ☐ Other: \_\_\_\_\_

#### SITE INFORMATION

No Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>480275</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>E. Stieber Consolidation</u>		Latitude: <u>40.043547</u>	Longitude: <u>-104.857700</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNE</u>	Sec: <u>23</u>	Twp: <u>1N</u>	Range: <u>67W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Ag

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

Is groundwater less than 20 feet below ground surface? Yes

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

☒ E&P Waste      ☐ Other E&P Waste      ☐ Non-E&P Waste

☒ Produced Water      ☐ Workover Fluids

☒ 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	GROUNDWATER	TBD	TBD
Yes	SOILS	TBD	TBD

### INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

The flowline has been repaired and the impacted soil in the immediate area has been removed.

### 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 ):

The number of soil samples will be determined once impacts are delineated

#### Proposed Groundwater Sampling

☒ Will groundwater samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

The number of water wells to be installed to monitor GW will be determined once impacts are fully delineated. A minimum of 4 wells will be installed around the impacted area.

#### 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 915-1 \_\_\_\_\_  
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 > 915-1 \_\_\_\_\_  
Vertical Extent > 915-1 (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 915-1 \_\_\_\_\_

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 915-1  
If surface water is impacted, other agency notification may be required.

## **OTHER INVESTIGATION INFORMATION**

☒ Were impacts to adjacent property or offsite impacts identified?

Impacts have been observed off property to the West.

☐ 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?

The investigation and excavation will resume once the irrigation to the west is shut off for the 2021 season. KPK will pump and dispose of free product and contaminated GW daily M-F until the investigation can resume.

## **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.

Soil: Removal and disposal

Water: Pumping and removal through 2021 irrigation season, then BOS 200 and monitoring.

## **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.

Currently KPK has been excavating and removing impacted soils along with pumping free product on a daily basis. The excavation has been halted due to the danger of undermining an active irrigation line to the west. KPK had to backfill the excavation to eliminate damaging this irrigation line. The excavation was backfilled with 3" crushed concrete and a 6" slotted PVC pipe was installed in the backfill. KPK will pump free product and contaminated ground water from this PVC pipe daily M-F until the irrigation line is shut off for the season and the excavation can continue. KPK will dispose of the backfill material in accordance with 900 series rules when the excavation resumes.

## **Soil Remediation Summary**

☐ In Situ

☒ Ex Situ

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

☐ Yes Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards)   
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
☐ No Excavate and onsite remediation  
☐ No Land Treatment  
☐ No Bioremediation (or enhanced bioremediation)  
☐ No Chemical oxidation  
☐ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

☐ Yes Bioremediation ( or enhanced bioremediation )  
☐ No Chemical oxidation  
☐ No Air sparge / Soil vapor extraction  
☐ Yes Natural Attenuation  
☐ Yes Other Pumping of free product and BOS200 \_\_\_\_\_

### **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.

Teh number and placement of GW monitoring wells will be determined when impacts have been delineated.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Approved Reporting Schedule:**

☐ Quarterly

☐ Semi-Annually

☐ Annually

☒ Other

Bi weekly sampling results

☐ **Request Alternative Reporting Schedule:**

☐ Semi-Annually

☐ Annually

☐ Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

**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 \_\_\_\_\_

If YES:

☐ Compliant with Rule 913.h.(1).

☐ Compliant with Rule 913.h.(2).

☐ Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

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

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

# 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.

Impacted area will be reclaimed to 1100 series rules.

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 provide the seed mix? \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

## **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 11/01/2021

Proposed date of completion of Reclamation. 11/01/2023

## **IMPLEMENTATION SCHEDULE**

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

## **PRIOR DATES**

Date of Surface Owner notification/consultation, if required. 07/07/2021

Actual Spill or Release date, or date of discovery. 07/07/2021

## **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 07/07/2021

Proposed site investigation commencement. 07/07/2021

Proposed completion of site investigation. 12/03/2021

## **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 12/31/2021

Proposed date of completion of Remediation. 03/01/2023

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

☐ Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

**OPERATOR COMMENT**

Latest (and all) domestic water well sampling results attached.

Details of ground water removal from stand pipe attached.

Disposal Manifests for Removed water attached.

Soil Boring Logs for GW monitoring Wells attached.

KPK is in daily contact with Bratner Ditch Rider (Bratner ditch feeds irrigation line), as soon as Bratner Ditch is drained for season work can begin on continuing excavation. As of 11/3/21 KPK anticipates this to be with in the next two weeks.

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

Signed: Ray Gorka

Title: Dir. Envi. Compliance

Submit Date:

Email: rgorka@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:

Date:

Remediation Project Number: 19616

**COA Type****Description**

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**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**

402858566	ANALYTICAL RESULTS
402858567	OTHER
402858595	OTHER
402859136	ANALYTICAL RESULTS
402859137	ANALYTICAL RESULTS
402859138	ANALYTICAL RESULTS
402859139	ANALYTICAL RESULTS
402859140	ANALYTICAL RESULTS
402859141	ANALYTICAL RESULTS
402859761	DISPOSAL MANIFESTS
402862163	OTHER

Total Attach: 11 Files

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

Environmental	Operator submitted this form on 10/14/2021, COGCC returned this form to draft and uploaded a copy to the Remediation file on 10/28/2021 as it was deemed insufficient under Rules 901.a, 913.d.(1) and COA's applied to previous Form 27s. Operator shall make the the following corrections and resubmit ASAP, no later than 10 days (November 7, 2021).	10/28/2021
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Total: 1 comment(s)