

State of Colorado
Oil and Gas Conservation Commission

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402843167
Receive Date:
10/15/2021

Report taken by:
Candice (Nikki) Graber

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>	Phone Numbers 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

PROJECT INFORMATION

Remediation Project #: 15825 Initial Form 27 Document #: 402444755

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: Quarterly Update

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>474780</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Cosslett #3</u>	Latitude: <u>40.080399</u>	Longitude: <u>-104.956453</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>1</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Cropland
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? Yes

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 by Occidental Petroleum about the Cosslett #3 flowline release. Upon notification of the release, KPK immediately shut-in the flowline. Excavation equipment was brought in to remove surface staining only. Additional excavation could not be performed due to co-located flowlines in the area. A hydrovac unit will be needed to continue excavation activities. No pooled liquids were present upon arrival at the location of the release. Based on the observation of minimal surface staining, it is estimated that the release was less than 1 bbl of fluid. Flowline failure occurred due to ground settling as a result of recent installation of flowline by separate operator. Damaged section of flowline will be repaired and flowline will be pressure tested before being brought back into service.

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 Tale 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):

If groundwater is encountered during excavation activities, one (1) grab sample will be collected and verified complaint with COGCC Table 910-1. If analytical results exceed Table 910-1 thresholds, a Form 27 Site Investigation and Remediation Workplan for the investigation and remediation of impacts to groundwater in accordance with Rule 909.c. will be submitted.

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?

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?

Total extent of soil impact remains to be defined. Extent of impacted soil will be defined by the final limits of excavation activities, which will be defined by analytical results of none detect or below Table 910-1 thresholds. Coordination with co-located operator to hydrovac release location necessary to begin any remediation work.

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.

Impacted soil will be excavated until soil sample results prove no exceedances of Table 910-1 thresholds. Grab soil samples will be collected to confirm the impact was removed.

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.

KPK has excavated all the contaminated material it can at this moment. Currently we are limited by pipeline safety rules that only allow for 10' of the high-pressure line that underlies KPK's line to be exposed. KPK is working with the operator of the high-pressure line to come up with a solution and will continue to remove impacted material once a resolution has been reached.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation) _____ Yes _____ Excavate and offsite disposal

Chemical oxidation
 Air sparge / Soil vapor extraction
 Natural Attenuation
 Other _____

If Yes: Estimated Volume (Cubic Yards) 10
 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

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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.

Upon obtaining complaint confirmation of soil samples, the excavation area will be backfilled, recontoured, ripped, and seeded.

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. _____

Proposed date of completion of Reclamation. _____

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/11/2020

Proposed site investigation commencement. 08/17/2020

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/17/2020

Proposed date of completion of Remediation. _____

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

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: 10/15/2021

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: _____

Date: _____

Remediation Project Number: 15825

Condition of Approval

COA Type

Description

	COGCC has processed this Form 27 into the record. However it was deemed inadequate under Rules 901.a, 915.e.(2), Table 915-1, and COA's applied to previous Form 27s. Operator shall address COA's and comments and submit a new Supplemental Form 27 ASAP, no later 30 days after processing of this Form 27.
	Proposed sampling plan indicates " At a minimum, one grab sample will be collected from each side of the excavation walls as well as from the base of the excavation area." Based on site inspections COGCC believes this number is not in compliance with COGCC guidance document 915.e.(2) Impact characterization.
	Form 27 states "it is estimated that the release was less than 1 bbl of fluid. Operator shall provide an explanation of how the volume of liquids spilled was calculated on the next Supplemental Form 27. COA initially applied to Form 19 Doc No. 402358249, submitted 4/1/2020. Operator shall provide these calculations on the next Supplemental Form 27.
	Implementation schedule is missing the following information: Date of surface owner notification, actual spill date, Proposed completion of site investigation, Proposed date of completion of Remediation. Per Rule 913.d.(2) Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule. 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.
	Source Removal Summary is not in compliance with Table 915-1. Operator shall update the sampling plan on the next Supplemental Form 27.
	Other investigation information is not in compliance with Table 915-1. Operator shall update the sampling plan on the next Supplemental Form 27.
	Proposed groundwater sampling is not in compliance with Table 915-1. Operator shall update the sampling plan on the next Supplemental Form 27.
	Proposed soil sampling is not in compliance with Table 915-1. Operator shall update the sampling plan on the next Supplemental Form 27.

	Operator shall provide an update on site activities including dates, volume of soil excavated, disposal manifests, and correspondence with third party limiting excavation activities that have not been reported within two weeks of the processing of this Form 27.
	Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to backfill, monitoring well installation, or any sampling events performed on location.
10 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

402843167	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Rule 909.c as listed under Proposed Groundwater Sampling is no longer in effect as of 01/15/2021.	11/01/2021
Environmental	Operator has provided no analytical, site maps, or other spill characterization data to the COGCC for this spill.	11/01/2021
Environmental	Passing the subject Form 27 serves to acknowledge receipt of the attached information by the COGCC and does not imply approval of any requests therein. COGCC's review of and response to such requests will be made separately.	11/01/2021

Total: 3 comment(s)