

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402843829
Receive Date:
10/15/2021

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.

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
Address: <u>1675 BROADWAY, STE 2800</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>	Phone: <u>(303) 8254822</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16995 Initial Form 27 Document #: 402611133

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: Request for Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>332996</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>JOHNSON-62N68W 30SWNE</u>	Latitude: <u>40.110850</u>	Longitude: <u>-105.043375</u>	
	** correct Lat/Long if needed: Latitude: <u>40.111050</u>	Longitude: <u>-105.043173</u>	
QtrQtr: <u>SWNE</u>	Sec: <u>30</u>	Twp: <u>2N</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? Yes
 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 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
UNDETERMINED	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 is requesting to remove the 100 bbl produced water storage vessel, which meets the definition of a partially buried vessel, from the JOHNSON #32-30 Tank Battery. The well associated to the tank battery is being P&A'd and the facility is planned to be removed. The partially buried storage vessel will be permanently closed per Rule 905.b.

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):

Five (5) discrete soil samples will be collected from the base of the produced water vessel (~3 ft below ground surface) to verify soil was not impacted from the operation of the partially buried produced water vessel. Analysis for grab samples included Table 915-1 analytes. See attached site map for partially buried vessel location and proposed sampling locations.

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

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

_____ 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.

REMEDATION 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: _____

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? Yes _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes _____

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.

Excavation area will be backfilled with clean fill dirt appropriate for the area. Area will be re-contoured to match surrounding contour and reseeded.

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? Yes _____

If YES, does the seed mix comply with local soil conservation district recommendations? No _____

Did the local soil conservation district provide the seed mix? No _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/08/2021

Proposed date of completion of Reclamation. 06/08/2023

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/08/2021

Proposed site investigation commencement. 02/08/2021

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/08/2021

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

Waiting approval to remove tank, applied, not approved.

Keep trying..

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. environ. Compliance

Submit Date: 10/15/2021

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: 16995

Condition of Approval

COA Type

Description

	On the Remediation Completion Report tab, the Operator checked "Compliant with Rule 913.h.(2)?" Rule 913.h.(2) applies only if the Operator has requested a variance pursuant to Rule 502. There is no record of a variance being requested.
	Operator will submit relevant photo documentation. The photos submitted with the subject Supplemental Form 27 only show the location after the excavation had been backfilled and graded.
	Operator will, as required by Rule 915.e.(1)A, submit their field notes, photographs, and measurements including all field screening results. Field measurements and field tests will be conducted using appropriate equipment, calibrated and operated according to manufacturer specifications, by personnel trained and familiar with the equipment.
	Operator shall submit a current map of the subject location including excavation limits and soil sample locations. GPS data used to create the map must comply with COGCC Rule 216.
	The Operator will explain the discrepancy in their numbering of soil background samples.
	Operator will address the pH values exceeding Table 915-1 Cleanup Concentrations.
	Operator will have their laboratory verify the sodium adsorption ratio calculations for #003 2103017-03 (Soil) and #5 (BG), each of which appears to be off by an order of magnitude.
	The Operator will complete the collection and analysis of confirmation samples as described in their approved Initial Form 27 (document 402611133). In their Initial Form 27, the Operator stated five (5) discrete soil samples would be collected for laboratory analysis. The soil sample location map attached to the initial Form 27 also depicts five (5) soil sample locations. However, the soil sample location map attached to the subject Supplemental Form 27 shows only four (4) sample location. Further, the attached laboratory report includes analytical results for only four (4) soil samples. No explanation was given for the discrepancy.
	COGCC does not approve the operator's request for closure of REM 16995.

9 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**

402843829	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

User Group **Comment**

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)