

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
402748673  
Receive Date:  
07/15/2021  
Report taken by:  
KRIS NEIDEL

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>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Max Knop</u>	Email: <u>mknop@kpk.com</u>	Phone: <u>(303) 825-4822</u>
		Mobile: <u>(720) 317-8161</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11881 Initial Form 27 Document #: 401766907

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>452051</u>	API #: _____	County Name: <u>JACKSON</u>
Facility Name: <u>DAKLAK Flowline</u>	Latitude: <u>40.778298</u>	Longitude: <u>-106.263055</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>4</u>	Twp: <u>9N</u>	Range: <u>79W</u>
	Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

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

Other Potential Receptors within 1/4 mile

### 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	SOILS	300'x75'	Soil Samples

#### 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 spill occurred during prior operator. Most of the impact remained at surface and it was removed immediately.

#### 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 ):

Based on analytical results from histoical soil sampling, excavation is necessary to remove impacted soil associated the release. Final vertical and horizontal extent of excavation area will be based on results from collected grab soil samples. All soil samples will be analyzed and verified compliant with COGCC Table 915-1.

##### 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

NA / ND

Number of soil samples collected 10

-- Highest concentration of TPH (mg/kg) 1200

Number of soil samples exceeding 915-1 9

-- Highest concentration of SAR 48.9

Was the areal and vertical extent of soil contamination delineated? Yes

BTEX > 915-1 Yes

Approximate areal extent (square feet) 22500

Vertical Extent > 915-1 (in feet) 0

**Groundwater**

Number of groundwater samples collected 0

NA Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? No

NA Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) 30'

NA Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed 0

NA Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Methane (mg/l) \_\_\_\_\_

**Surface Water**

0 Number of surface water samples collected

0 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?

Tilling activities have resulted in increased alkali occurring at ground surface. Background samples need to be collected to determine if high SAR and EC are a result of the release or is a result of the native soil within the release area.

**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.

Impacted soil with analytical results exceeding Table 915-1 thresholds will be excavated and disposed of at the Walden Land Treatment Facility.

**REMEDIATION 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.

Based on analytical results of soil samples collected 9/26/2018, additional remediation work is necessary at the release point and associated release area. Additional tilling activities will occur in 2020 and 2021 to continue remediation of impacted area. Soil samples will be collected August 2021 to review remediation progress. Final vertical and horizontal extent of excavation area will be based on results from collected discrete soil samples. Discrete soil samples will be collected from the base and walls of the final area of excavation. Discrete soil samples will be collected from investigation area showing no elevated PID readings. All soil samples will be analyzed for and verified compliant with COGCC Table 915-1.

**Soil Remediation Summary**

In Situ

Ex Situ

No Bioremediation ( or enhanced bioremediation )

Excavate and offsite disposal

No Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_



# 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.

The vertical extend of the contamination was minimal. No recontouring will be necessary.

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? Yes \_\_\_\_\_

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. 09/02/2017

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/02/2017

Proposed site investigation commencement. 09/05/2017

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/05/2017

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**

KPK is currently devoting its internal and third-party resources on remediation's that have designated "high priority" by KPK staff and conversations with COGCC personnel. The high priority projects that KPK is devoting the entirety of its resources on are project #'s 15771, 15811, 16029, 16131, 14048, 18594, 12158, and 18932. This project has been determined to be low risk to the health and safety of the environment and people, and thus has not had any progress in the 2nd quarter. Work will commence on this project once resources become available when the above-mentioned projects are completed.

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

Signed: Max Knop

Title: Gen Mangr of Air Quality

Submit Date: 07/15/2021

Email: mknop@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: KRIS NEIDEL

Date: 01/04/2022

Remediation Project Number: 11881

### **Condition of Approval**

#### **COA Type**

#### **Description**

<b><u>COA Type</u></b>	<b><u>Description</u></b>
0 COA	

### **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**

402748673	FORM 27-SUPPLEMENTAL-SUBMITTED
-----------	--------------------------------

Total Attach: 1 Files

### **General Comments**

#### **User Group**

#### **Comment**

#### **Comment Date**

Environmental	Operator will comply with the current version of Table 915-1.	01/04/2022
Environmental	In the next quarterly report a plan to address all exceedances shall be submitted	01/04/2022
Environmental	By Rule, samples shall be discrete not composite.	01/04/2022
Environmental	The area at the release point shall be properly delineated, currently it is not	01/04/2022
Environmental	The COGCC does not approve the priority of addressing open remediation projects. This project shall be delineated in 2022.0	01/04/2022
Environmental	The next Form 27 update shall use the "Implementation Schedule" of this form.	01/04/2022

Total: 6 comment(s)