

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:

402927525

Receive Date:

01/14/2022

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
Address: <u>1675 BROADWAY, STE 2800</u>		Phone: <u>(208) 2018280</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jennifer Galles</u>	Email: <u>PrimaryContractor@marcomllc.net</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15829 Initial Form 27 Document #: 402444957

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>459299</u>	API #: <u></u>	County Name: <u>WELD</u>
Facility Name: <u>SPILL/RELEASE POINT</u>		Latitude: <u>40.124127</u>	Longitude: <u>-105.008090</u>
		** correct Lat/Long if needed: Latitude: <u></u>	Longitude: <u></u>
QtrQtr: <u>NESE</u>	Sec: <u>21</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 and Gravel Pits

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	SOILS	Unknown	Undetermine

INITIAL ACTION SUMMARY

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

A contractor for Extraction was boring a new line under KPK's consolidation flowline (currently shut-in due to line being stung East of release) and an abandoned flowline, when they encountered a historical release via drill cuttings and tie-in access. There are no live lines in the area and the only active line was flushed before this release was discovered.

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 Table 915-1.

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 compliant with COGCC Table 915-1. If analytical results exceed Table 915-1 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 according to Table 915-1 concentration levels.

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 915-1 thresholds. Grab soil samples will be collected to confirm the impact was removed.

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.

Excavation source removal and confirmation soil sampling. Excavated soil will be disposed of at a certified disposal facility.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 100

_____ 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: _____

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? _____

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). 11/28/2018

Proposed site investigation commencement. 12/14/2020

Proposed completion of site investigation. 12/31/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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:

Updated schedule due to change of consultant and GRIP prioritization.

OPERATOR COMMENT

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

Signed: ` Jennifer Galles _____

Title: Consultant _____

Submit Date: ` 01/14/2022 _____

Email: PrimaryContractor@marcomllc.net _____

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: Candice (Nikki) Graber _____

Date: 02/23/2022 _____

Remediation Project Number: 15829 _____

Condition of Approval

COA Type

Description

	The Implementation Schedule does not indicate the Remedial Action Dates. The Operator shall include this information on the next Supplemental Form 27.
	The proposed soil sampling plan indicates the "Final vertical and horizontal extent of the excavation will be based on results from collected grab soil samples as well as from the base of the excavation area." COGCC believes this number is not in compliance with COGCC guidance document 915.e.(2) impact characterization. The Operator shall collect samples from areas most likely to have been impacted, as well as, collect and analyze nearby non-impacted native soil for the purpose of establishing background conditions including pH, SAR, and other constituents as identified in the E&P Waste profile per 915.e.(2)B. and 915.e.(2)D.
	The Operator shall indicate the Name of Licensed Disposal Facility or COGCC Facility ID # under the Soil Remediation Summary section on the next Supplemental Form 27.
	COGCC site inspection from 12/4/2018 indicates water was observed in the open excavation. In Doc #402649620 - The Operator stated: " The Facility 4A Consolidation Line, has been repaired and backfilled. The majority of the contaminated soil has been removed. Current plans are to chase out the final extent off the contamination and sample/close the remediation when crews become available." The Operator has generated E&P waste as a result of remediation (Remediation #15829); However, no disposal documentation for groundwater or soil removed from the excavation prior to backfilling has been provided to verify compliance with Rule 905. As such, the Operator shall update the Waste Disposal Information section on the next Supplemental Form 27.
	Operator will provide notice to COGCC EPS at least 72 hours prior to excavation/backfill, soil boring/monitoring well installation, or any sampling events performed on location.
	Per Rule 913.d.(1) Operators will investigate impacts to soil, groundwater, and surface water as soon as impacts are discovered.
	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.

	Operator has not provided results of a soil assessment despite reporting 100 cubic yards of soil has been excavated and disposed of offsite. Therefore, it cannot be ascertained whether a threat to soil or groundwater exists. If the Operator has previously collected soil samples, then the Operator must submit the analytical reports and attach a sample summary table on the next Supplemental Form 27.
	Per COA on Doc #402748659 - This form is being accepted into the record. However, Form 27 does not meet the requirements of Rule 913.d. Implementation Schedule, because no schedule for remediation has been provided. Remediation Summary does not indicate a timeframe for expected excavation work for removing impacted soils. An update on this work is required. The Operator shall submit the expected timeframe on a Supplemental Form 27 within 14 days with a specific schedule for site investigation and remediation of impacts to soil and groundwater.
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

402927525	FORM 27-SUPPLEMENTAL-SUBMITTED
-----------	--------------------------------

Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

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

Total: 0 comment(s)