

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

403046549

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>1700 LINCOLN ST STE 4550</u>		Phone: <u>(970) 237-1415</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Levi Kirk</u>	Email: <u>PrimaryContractor@marcomllc.net</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20120 Initial Form 27 Document #: 402795971

#### 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>480127</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>RMF Consolidation Line</u>		Latitude: <u>40.071160</u>	Longitude: <u>-104.900010</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNW</u>	Sec: <u>9</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 dry land ag/pasture

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

**Other Potential Receptors within 1/4 mile**

Potential wetlands to south

**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 yards	Measurement of excavation

**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 KPK believes the impacted soil has been removed at this time. Lab samples have shown non-detect for all organics and nor inorganic exceedances of table 915 except for SAR. KPK is currently investigating if high SAR is naturally occurring or more excavation will need to be done. The excavation was field screened by MarCom personnel on 11/9/2022, and was determined further excavation was required. Further excavation was conducted, and following a 48hr COGCC notification, soil confirmation samples were collected on 1/20/2022, and analytical from this sampling event exceeding table 915.1 limits (See attachments).

**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 ):

Sampling was conducted following a 48 notice provided to COGCC. Sampling followed the COGCC table 915.1 guidances. Following initial confirmation sampling, additional excavation is required. Additionally a site specific at depth background plan has been submitted for approval.

**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**

Number of soil samples collected 14  
Number of soil samples exceeding 915-1 10  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 800

### **NA / ND**

ND Highest concentration of TPH (mg/kg) 51  
-- Highest concentration of SAR 3.26  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 8

### **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?

Background samples were taken for Arsenic due to anticipated high naturally occurring background concentrations. Highest result is excavation was 7.63mg/kg which is below 1.25x background (BG2 6.74x1.25=8.42mg/kg). KPK will be investigating SAR background concentrations. Additionally site specific at depth backgrounds will be collected using a Geoprobe. All boring will be geologically logged.

☐ 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?

Site specific backgrounds will be collected.

## **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 removed with an excavator, line will be repaired and capped. Impacts will be removed until confirmation samples are below COGCC limits. Impacted soils will be disposed of at approved landfill facility.

## **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.

The flowline has been repaired and KPK believes the impacted soil has been removed at this time. Lab samples have shown non-detect for all organics and nor inorganic exceedances of table 915 except for SAR. KPK is currently investigating if high SAR is naturally occurring or more excavation will need to be done. The excavation was field screened by MarCom personnel on 11/9/2022, and was determined further excavation was required. Further excavation was conducted, and following a 48hr COGCC notification, soil confirmation samples were collected on 1/20/2022, and analytical from this sampling event exceeding table 915.1 limits (See attachments).

## **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  
☐ Land Treatment  
☐ Bioremediation (or enhanced bioremediation)  
☐ Chemical oxidation  
☐ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

☐ No Bioremediation ( or enhanced bioremediation )  
☐ No Chemical oxidation  
☐ No Air sparge / Soil vapor extraction  
☐ No 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Hydrocarbon impacted soils

Volume of E&P Waste (solid) in cubic yards 275

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Waste Connections

Volume of E&P Waste (liquid) in barrels 0

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? No

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.

Reclaim in accordance with 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? No

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

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

## **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 05/11/2022

Proposed date of completion of Reclamation. 07/15/2022

## **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. 06/02/2021

Actual Spill or Release date, or date of discovery. 06/02/2021

## **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 06/02/2021

Proposed site investigation commencement. 09/30/2021

Proposed completion of site investigation. 06/30/2022

## **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 11/01/2021

Proposed date of completion of Remediation. 06/30/2022

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**

This Form 27 is being submitted in efforts to move forward with site specific at depth backgrounds. Maps, and additional attachments will be submitted with the next supplemental form 27 as per discussion with COGCC staff.

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

Signed: Levi Kirk

Title: Project Manager

Submit Date:

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:

Date:

Remediation Project Number: 20120

**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**

403046550	ANALYTICAL RESULTS
403046551	ANALYTICAL RESULTS
403046552	ANALYTICAL RESULTS

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)