

State of Colorado Oil and Gas Conservation Commission

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403080796

Receive Date:

06/16/2022

Report taken by:

Kari Brown

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>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 #: 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 to remove tank battery until impacts are fully removed.

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>332996</u>	API #: <u></u>	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:

☒ 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
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. On behalf of KPK MarCom is proposing a site specific at depth background plan that will include 4 different background 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

Soil

Number of soil samples collected 8

Number of soil samples exceeding 915-1 4

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

Approximate areal extent (square feet) 400

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

NA / ND

-- Highest concentration of TPH (mg/kg) 68

-- Highest concentration of SAR 2.73

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 3

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?

MarCom is proposing site specific at depth backgrounds for the site at 3'. If background do not dismiss elevated concentrations of Barium and PH additional excavation will continue, until impacts are fully removed.

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.

If soil is found to be impacted due to the operation of the partially buried produced water vessel, Form 19 will be submitted reporting the associated release. Impacted soil will be excavated until soil sample analyses results show no exceedances of Table 915-1 thresholds.

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.

Impacted soil will be excavated and 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) 10

_____ 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

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

KPK holds general liability insurance and financial assurance in accordance to the agreed upon amount in the CPA and Grip.

Operator anticipates the remaining cost for this project to be: \$ 100

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:

None

Volume of E&P Waste (solid) in cubic yards 10

E&P waste (solid) description fill dirt that was around the bottom of the tank battery and in contact with the bottom (overburden)

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Front range landfill

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

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? 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. 05/10/2023

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. 09/30/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/01/2022

Proposed date of completion of Remediation. 07/25/2022

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:

Updated site investigation schedule due to change in consultant and GRIP priorities.

OPERATOR COMMENT

This Form 27 is being submitted in efforts to move forward with the proposed site specific at depth backgrounds plan. Please note that all analytical maps, and COAs will be addressed on the next supplemental form 27.

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: 06/16/2022

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: Laurel Anderson

Date: 06/20/2022

Remediation Project Number: 16995

Condition of Approval**COA Type****Description**

	Per COA on Doc #402935942: "The Other Investigation section on Doc #402935942 has not been populated. The Operator shall update this section with the relevant information in the next Supplemental Form 27." Operator shall answer the questions: "Were background samples collected as part of this site investigation?" to include previous background samples collected and background samples proposed in the subject Form (Doc 403080796).
	Per COA on Doc #402935942: "The Operator indicates the Surface Owner will provide seed mix; However, the prior dates section indicates the Surface Owner was not notified/consulted. The Operator shall update this section with the relevant information on the next Supplemental Form 27."
	Per COA on Doc #402935942: "Operator will address the pH values exceeding Table 915-1 Cleanup concentrations and arsenic concentrations exceeding 1.25 times the background level in soil sample 003 on the next Supplemental Form 27." Operator shall address arsenic concentrations exceeding 1.25 times the background level in addition to pH values exceeding Table 915-1 cleanup concentrations.
	Per COA on Doc #402753522 - The 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 and provide an update on the next Supplemental Form 27.
	Operator shall submit Quarterly Updates every 90 days including a detailed project summary and status, as required by Rule 913.e. The subject Form was submitted 142 days late.
	Operator shall complete the Adequacy of Operator's General Liability Insurance and Financial Assurance section on the next Form 27 Subsequent to provide information about their general liability insurance coverage and an estimate of remaining project costs based on current available data as required per Rule 705.f.
6 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**

403080796	FORM 27-SUPPLEMENTAL-SUBMITTED
403082145	ANALYTICAL RESULTS
403082247	SITE MAP

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	COGCC approves of the proposed background sample locations.	06/17/2022

Total: 1 comment(s)