

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403166227

Receive Date:

09/29/2022

Report taken by:

Kari Brown

Site Investigation and Remediation Workplan (Initial 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>(720) 434-2215</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Ray Gorka</u>	Email: <u>primarycontractor@marcomllc.net</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25978 Initial Form 27 Document #: 403166227

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>TANK BATTERY</u>	Facility ID: <u>482821</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Koch Tank Battery</u>		Latitude: <u>40.079624</u>	Longitude: <u>-105.037601</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NENE</u>	Sec: <u>6</u>	Twp: <u>1n</u>	Range: <u>68w</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Open space

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

Other Potential Receptors within 1/4 mile

Approximately 1 resident, and possibly 1 habitable structures are within a quarter mile of the Tank Battery. County road 3 is 122' to the east; the nearest surface water is approximately 190' East of the Tank Battery. High Priority habitat is not present within a quarter mile; there is no Bald Eagle Roost site within a 1/4 mile; there are no Bald Eagle Active Nest site within a half mile. There are 4 domestic water wells within a quarter mile of the tank battery. There is Freshwater Emergent Wetland Habitat approximately 89' from the tank Battery.

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 checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" 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	TBD	Inspection/soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

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

This form has been prepared to provide prior notice of the plugging and abandonment of the KOCH Tank Battery, the associated onsite flowline, separator, and produced water vessel, which is the production facility for the Kenneth E Koch 1, and the Koch 41-6. The off location flowline system pre-removal notice was submitted under Form 44 Doc. 403059200, this document has Bulthaupt-61N68W-BATT6NENE listed which is the name of the associated facility being removed prior to COGCC renaming and creating the Koch Tank Battery Facility. The facility is shared with Kerr McGee (the Bulthaupt is Kerr McGee). Only the KPK tank Battery, Separator, produced water vessel, and associated flowlines are being removed. In accordance with COGCC Rule 911.a., soil and groundwater (if present) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with COGCC Table 915-1. Visual inspection and field screening of soils around the header, separator, and associated tanks will be conducted during sampling activities. Soil vapor screening will also be conducted around the facility. The topographic Site Location Map showing the geographic setting of the site is provided as Figure 1. Site still has an active battery present by another operator.

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):

Following Facility equipment removal operations, soil will be field screened below and/or adjacent to the tank battery, the separator, and the produced water vessel as defined in the Rule 911.a.(4) guidance document. Screening will be conducted every 20' along the associated flowline. Discrete Soil samples will be collected for laboratory analysis in any area observing hydrocarbon impacts, flowline transitions, flowline bends, valves, at ends of flowlines, under equipment and the location with the highest PID. GPS data will be collected for all soil sample and screening locations. Soil samples will be submitted for laboratory analysis of COGCCs full table 915.1 constituents. Additionally, soil sample(s) will be collected in the area most likely to be impacted by produced water to confirm soil suitability for reclamation. The sample(s) will be submitted for laboratory analysis of COGCC Table 915.1 Inorganics constituent. Refer to the Proposed Sample Location Map.

Proposed Groundwater Sampling

☒ Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

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):

If no impacts are observed, a minimum of one soil sample from the Tank Battery, Separator Riser, 3' below the produced water vessel and associated flowline excavations will be submitted for laboratory analysis of BTEX, TMBs, naphthalene, and total petroleum hydrocarbons (TPH) - gasoline range organics (GRO: C6-C10) by United States Environmental Protection Agency (USEPA) Method 8260D, TPH - diesel range organics (DRO: C10-C28) and oil range organics (ORO: C28-C40) by USEPA Method 8015D, pH, specific conductance (EC) and sodium adsorption ratio (SAR) by saturated paste method, and boron by hot water soluble soil extract method. If impacts are encountered, a minimum of one soil sample will be submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite.

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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If a suspected release is identified and confirmed through soil screening and/or laboratory analysis, soils will be removed and transported to a licensed disposal facility. Disposal records will be kept on file and available upon request.

REMEDIAL ACTION 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.

Potential impacts that meet the criteria in Rule 912.b. will be reported to the Director in accordance with that Rule and a site-specific soil and/or groundwater remediation plan will be developed and submitted to the COGCC via a supplemental Form 27 in accordance with Rule 913. If reportable impacts are not encountered, a supplemental Form 27 requesting closure will be submitted within 90 days following completion of sampling activities. Field screening and applicable laboratory analytical results will be reported in all submittals. E&P waste records of material transported off-site are kept on file and available upon request. Operator will submit Form 27 within 45 days of site investigation completion, detailing the findings and completion of the P&A activities.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

☐ Ex Situ

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ 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.

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

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

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 has sufficient insurance and bonding to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. KPK has general liability insurance and financial assurance in compliance with COGCC rules. The cost for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. KPK makes no representation or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 10000

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:

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 site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules. The surface owner is planning an industrial development on this quarter section.

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? _____

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. 02/01/2023

Proposed date of completion of Reclamation. 02/25/2023

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. 11/23/2020

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/30/2022

Proposed site investigation commencement. 11/15/2022

Proposed completion of site investigation. 01/10/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/03/2022

Proposed date of completion of Remediation. 02/03/2023

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 I is being submitted in the effort to begin P&A activities at the Koch Tank Battery location. The Koch Tank Battery facility was created by COGCC to separate the KPK equipment (Koch Tank battery) and the Kerr McGee equipment (Bulthaup) at the shared facility. All comments in regards to the Koch Tank battery attached to the COGCC presentation for properly completing P&A forms conducted on 9/8/2022 have been addressed within this form.

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: 09/29/2022

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: Kari Brown

Date: 11/17/2022

Remediation Project Number: 25978

COA Type

Description

	Operator's proposed start date of 9/30/2022 for site investigation planned start date has passed prior to approval of the subject form. COGCC has not been notified of any work to date. Operator shall update the implementation schedule on the subsequent Supplemental Form 27.
	Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to site investigation activities.
	"Operator's proposed sampling plan contradicts itself. Therefore: If field screening efforts indicate no impacts present Operator shall analyze soil samples for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene., total petroleum hydrocarbons (TPH) - gasoline range organics (GRO: C6-C10) by United States Environmental Protection Agency (USEPA) Method 8260D, TPH - diesel range organics (DRO: C10-C28) and oil range organics (ORO: C28-C40) by USEPA Method 8015D, pH, specific conductance (EC) and sodium adsorption ratio (SAR) by saturated paste method, and boron by hot water soluble soil extract method. If field screening efforts indicate the presence of soil impacts from organics or inorganics, Operator shall analyze soil samples for TPH PH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble))."
	Operator shall submit field notes for all field activities reported during the respective Quarterly Update. If field screening is to be used in conjunction with laboratory reports then Operator shall provide field screening readings during the respective Quarterly update.
	Location lies adjacent to a jurisdictional Wetland as mapped on the National Wetland Inventory Maps. In the event that operations encroach upon the wetland, Operator shall consult with the US Army Corps of Engineers regarding compliance with Sections 401 and 404 of the Clean Water Act. Operator shall submit all communications/permits obtained to the COGCC via Form 4 Sundry.
	If borings are used during site investigation then Operator shall provide boring logs in accordance with standard environmental practices for all soil borings advanced during site investigation on the subsequent supplemental Form 27. This includes at a minimum; lithology description, USCS classifications, PID readings, sample collection depths, depth to water, and well construction (if applicable).
	Operator shall adopt a quarterly reporting schedule
7 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.

<u>Att Doc Num</u>	<u>Name</u>
403166227	FORM 27-INITIAL-SUBMITTED
403166722	SITE MAP
403166728	SOIL SAMPLE LOCATION MAP
403166729	SITE MAP
403166730	OTHER

Total Attach: 5 Files

General Comments

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

Total: 0 comment(s)