

# State of Colorado Oil and Gas Conservation Commission

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08/30/2022

Report taken by:

Laurel Anderson

## 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>(208) 604-5397</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Vanessa Morgan</u>	Email: <u>PrimaryContractor@marcomllc.net</u>	Mobile: <u>( )</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: Quarterly Update

#### SITE INFORMATION

No Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>452051</u>	API #: <u></u>	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: <u></u>		Longitude: <u></u>	
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

## 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 historical 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 15

Number of soil samples exceeding 915-1 15

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

Approximate areal extent (square feet) 22500

-- Highest concentration of TPH (mg/kg) 13000  
0

-- Highest concentration of SAR 63.95

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 0

#### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

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

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

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. 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  
☐ No Air sparge / Soil vapor extraction  
☐ Yes Natural Attenuation  
☐ No Other \_\_\_\_\_

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**

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

### 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? No

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:

## 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?

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 extent 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. 09/30/2022

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2022

Proposed date of completion of Remediation. 12/29/2023

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:

Implementation schedule updated to account for GRIP priority sites.

**OPERATOR COMMENT**

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

Signed: Vanessa Morgan

Title: Env. Scientist

Submit Date: 08/30/2022

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: 11/22/2022

Remediation Project Number: 11881

**COA Type****Description**

	Operator shall populate the Reclamation Plan on the next Supplemental Form 27.
	Operator shall populate the "Date of Surface Owner notification/consultation" on the next Supplemental Form 27.
	Operator shall populate the sensitive receptors list on the next Supplemental Form 27.
	This Form 27 Supplemental is being approved as submitted. However, the next Form 27 Supplemental must be populated with the Adequacy of Operator's General Liability Insurance and Financial Assurance data field under the Remediation Progress Update tab as required by Rules 703.b and 705.b. Note: Based on the scope of work proposed COGCC does not believe Operator anticipated the remaining cost for this project is adequate.
	Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) and COGCC EPS Kris Neidel (kris.neidel@state.co.us) at least 48 hours prior to soil boring, or any sampling events performed on location.
	All unaddressed COAs/CAs from previously approved forms/inspections still apply. Additionally, all COAs applied to the GRIP apply to this remediation project.
	Location lies within mapped Greater Sage Grouse Lek Site, a Greater Sage Grouse Priority Habitat Management Area, a Pronghorn Migration Corridor, and a Greater Sage Grouse General Habitat Management Area. Please note that Approval of this Form 27 does not supersede any Federal, State or Local regulations. COGCC recommends consultation with Colorado Parks and Wildlife and US Fish and Wildlife Agency. Operator shall provide correspondence via Form 27 prior to initiating field work.
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule. COGCC selected Quarterly under Remediation Progress Update.
	On the next Form 27 Operator shall provide a detailed stand alone implementation plan proposing dates for completion of all field work to occur as soon as possible in Spring 2023.
	Based on site characterization maps all soil samples are from source zone only and don't encompass the entire footprint of the spill. Operator shall collect samples to accurately characterize the entire footprint of the spill.
10 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**

403150376	FORM 27-SUPPLEMENTAL-SUBMITTED
403150418	ANALYTICAL RESULTS
403150419	ANALYTICAL RESULTS

403150420	MAP
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Total Attach: 4 Files

### **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Attached analytical results from 2017 and 2018 have previously been reported.	11/22/2022

Total: 1 comment(s)