

State of Colorado Oil and Gas Conservation Commission

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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>(720) 434-2215</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Ray Gorka</u>	Email: <u>rgorka@kpk.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22276 Initial Form 27 Document #: 402967786

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>LOCATION</u>	Facility ID: <u>323149</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>CHAMPLIN 86 AMOCO F-61N68W 4NESW</u>		Latitude: <u>40.078497</u>	Longitude: <u>-105.010680</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>4</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 Future Residential Development

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

There are no residence or habitable structures within a quarter mile of the well. There are no roads within a quarter mile of the well. The wellhead is 1230' south-east of the nearest surface water. The 100 year floodplain is not within a quarter mile of the well. There are no High Priority habitats within a quarter mile of the well. There are no Bald Eagle Roost sites or Bald Eagle Active Nest site half mile buffer within a quarter mile. There are 4 domestic water wells within a quarter mile of the well and the same number of wells at the end of the flowline.

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	TBD	TBD

INITIAL ACTION SUMMARY

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

On March 24th, 2022 KPK operators cut and capped the well head at the Champlin 86 Amoco F7 facility. During the removal of soil around the well head during the cut and capping process, impacts were discovered. KPK operators removed and excavated the impacts. On May 10th, KPK personnel oversaw the removal of the remaining impacts, and field screened the site. A total of 10 yards of soil was removed from the site, and a form 19 was submitted to report the historical release findings (Doc. 403046547) . Excavation was completed and COGCC was provided with a 48 hour notice of sampling on May, 11, 2022. Analytical results attached indicate that additional investigation is required.

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):

On March 24th, 2022 KPK operators cut and capped the well head at the Champlin 86 Amoco F7 facility. During the removal of soil around the well head during the cut and capping process, impacts were discovered. KPK operators removed and excavated the impacts. On May 10th, KPK personnel oversaw the removal of the remaining impacts, and field screened the site. A total of 10 yards of soil was removed from the site, and a form 19 was submitted to report the historical release findings (Doc. 403046547) . Excavation was completed and COGCC was provided with a 48 hour notice of sampling on May, 11, 2022. Analytical results attached indicate that additional investigation is required. Following the removal of the remaining impacts MarCom will provide COGCC with a 48 HR notice prior to conducting confirmation sampling. Confirmation soil samples will be collected as described in the Rule 915.e.(2) Guidance Document and will be analyzed for full Table 915-1 Constituents.

Proposed Groundwater Sampling

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

If groundwater is encountered during remediation, groundwater samples will be collected, and a Groundwater Monitoring (GWM) Plan will be proposed to COGCC. Upon approval of the GWM plan, COGCC will be provided with a 72-hour notice before well installation.

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 8

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

Approximate areal extent (square feet) 144

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 14.7

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 collected and analyzed for full table 915-1 inorganic constituents. A total of 8 backgrounds were collected.

☐ 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?

Further site investigation is required to determine and remove all impacts remaining in-situ.

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.

On March 24th, 2022 KPK operators cut and capped the well head at the Champlin 86 Amoco F7 facility. During the removal of soil around the well head during the cut and capping process, impacts were discovered. KPK operators removed and excavated the impacts. On May 10th, KPK personnel oversaw the removal of the remaining impacts, and field screened the site. A total of 10 yards of soil was removed from the site, and a form 19 was submitted to report the historical release findings (Doc. 403046547). Excavation was completed and COGCC was provided with a 48 hour notice of sampling on May, 11, 2022. Analytical results attached indicate that additional investigation is required.

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.

Excavation was performed to remove historical impacts. Impacted soil was taken to a certified disposal facility. Excavation and disposal of impacted soil proceeded until PID field screening results indicated that soil impacts had been removed. Following notification to COGCC, confirmation samples were collected and analyzed for Table 915-1 constituents. Analytical results indicated that additional investigation/excavation is required. If groundwater is found to be impacted, a groundwater monitoring plan will be submitted for review and approval to address known impacts to groundwater. If additional excavation is required, the extent of the impacts will be delineated using soil borings

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

Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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 remediation, groundwater samples will be collected, and a Groundwater Monitoring (GWM) Plan will be proposed to COGCC. Upon approval of the GWM plan, COGCC will be provided with a 72-hour notice before well installation.

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? Yes

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

NO beneficial use

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

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Frontrange 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:

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.

Upon receiving confirmation sample analytical that shows all impacts have been removed, KPK will submit request for Backfill to the state. Upon completion of the backfill KPK will consult with the landowner on seeding preference, as of now the site is planned to be a residential development. Reclamation will commence following the 1000 series reclamation 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? _____

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. 03/25/2022

Actual Spill or Release date, or date of discovery. 03/24/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/14/2022

Proposed site investigation commencement. 03/25/2022

Proposed completion of site investigation. 12/01/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/04/2022

Proposed date of completion of Remediation. 12/20/2022

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 to update the findings from the completion of P&A activities. Updated analytical has been provided, along with sampling locations, and attached manifests. Additional investigation/ excavation will be conducted to remove remaining impacts. Updated analytical, photographs, and maps will be provided in a 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: 10/26/2022

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: 02/15/2023

Remediation Project Number: 22276

COA Type**Description**

	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule. COGCC selected Quarterly under Remediation Progress Update.
	Background samples NW Background, SW background, Background 4, and background 2 were collected from areas disturbed by oil and gas impacts and should not be used to calculate native background.
2 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**

403209093	FORM 27-SUPPLEMENTAL-SUBMITTED
403209431	ANALYTICAL RESULTS
403209458	ANALYTICAL RESULTS
403209460	ANALYTICAL RESULTS
403209461	ANALYTICAL RESULTS
403209465	DISPOSAL MANIFESTS
403209466	DISPOSAL MANIFESTS
403209467	DISPOSAL MANIFESTS
403209468	DISPOSAL MANIFESTS
403209469	DISPOSAL MANIFESTS
403209523	SOIL SAMPLE LOCATION MAP
403209524	SITE MAP

Total Attach: 12 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)