

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403265888
Receive Date:
12/20/2022

Report taken by:
Candice (Nikki) Graber

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 Phone: <u>(303) 825-4822</u> Mobile: <u>()</u>
Address: <u>1700 LINCOLN ST STE 4550</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Craig Meis</u>	Email: <u>cmeis@kpk.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27845 Initial Form 27 Document #: 403265888

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>482927</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Pete Montoya B1-#2</u>	Latitude: <u>40.093285</u>	Longitude: <u>-104.886298</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSW</u>	Sec: <u>34</u>	Twp: <u>2N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Industrial
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

No mapped high priority habitats within 0.5 miles. Nearest surface water is an irrigation ditch/wetland approximately 1,500 feet northwest. Closest mapped water well is approximately 680 feet east/southeast. Depth to water is estimated at 8 feet to 10 feet bgs.

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 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	GROUNDWATER	TBD	TBD
Yes	SOILS	15 ft x 40 ft x 8 ft	analytical data

INITIAL ACTION SUMMARY

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

Ft. Lupton FD responded to a call of a gas leak leak; KPK responded and shut in the wells, lines associated with the release. KPK notified all appropriate Parties, including the Surface Owner and coordinated field efforts to determine the cause and the impact. Field personnel found stained soil at release point. A berm was built around the exposed hole in the ground and a temporary orange construction fence put up around it to prevent un-authorized entry to excavation. Field personnel took a soil sample at the point of release and a background sample. The samples were sent to Summit labs; no results yet. KPK removed stain soil manifest is attached. At present, KPK's initial determination is the steel consolidation line corroded on the bottom, but the investigation is still on-going. Surface owner Western Midstream was notified on 9/19/22.

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):

Initial sampling data indicates that all organic impacts have been removed and the release did not contribute to elevated metals concentration in soil. However, boron, EC, SAR, and pH are elevated in post-excavation soil samples. Additional excavation is needed to address impacts. The final extents of the excavation will be based on results from grab soil samples and photoionization detector (PID) field screening. Confirmation soil samples will be collected as described in the Rule 915.e.(2) Guidance Document and will be analyzed for TPH (C6-C36), Table 915-1 Organic Compounds, and Table 915-1 Soil Suitability for Reclamation (EC, SAR, pH, and boron). At a minimum, one grab sample will be collected from each side of the excavation walls as well as from the base of the excavation area.

Proposed Groundwater Sampling

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

If groundwater is encountered during excavation, 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, and inorganic constituents. A Groundwater Monitoring plan with a total of 5 wells, 1 upgradient, 2 cross gradient, 1 down gradient, and 1 at source (Additional wells may be necessary) will be submitted for approval, and groundwater monitoring will continue until 4 clean consecutive quarters is achieved. COGCC will be provided a 48 Hour notice prior to the installation of monitoring wells. Boring and well construction logs will be completed and provided in a supplemental form 27.

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):

Additional investigation may be required to determine the extent of the impacts. Once excavation has begun it may be warranted to delineate further the extent of the excavation utilizing Geoprobng or drilling equipment, depending on excavation status, and analytical results. Initial and supplemental boring locations will be determined based on available data. If soil borings are installed, a supplemental Form 27 will be submitted with boring locations, bore logs, and applicate site data. COGCC will be provided with a 48 hr notice prior to any sampling event. In addition, background soil samples may be collected for boron, EC, SAR, and pH to evaluate if those constituents are naturally occurring.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 8

Number of soil samples exceeding 915-1 8

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 600

NA / ND

-- Highest concentration of TPH (mg/kg) 12340

-- Highest concentration of SAR 18.8

BTEX > 915-1 Yes

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?

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?

See the site investigation section.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The source of the impacts was shut in when the release was discovered. Impacted soil was removed utilizing a Hyrdovac and excavation equipment. All impacted soil was excavated and hauled to a certified disposal location. Waste disposal manifests will be provided with the next form submittal. MarCom will provide the required 48-hour notification to COGCC prior to beginning work.

REMEDATION 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.

Final vertical and horizontal extent of excavation will be based on limits of excavation and on results from grab soil samples and PID field screening. Confirmation soil samples will be collected as described in the Rule 915.e.(2) Guidance Document and will be analyzed for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, and Table 915-1 Soil Suitability for Reclamation. Samples will be collected in accordance to COGCCs table 915-1 sample collection guidelines table . If needed, extent borings may be installed, and soil samples collected to further evaluate the extent of soil impacts. COGCC will be provided with a 48 hr. notice prior to any sampling event.

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) _____ 170
- 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
- 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.

If groundwater is encountered during excavation 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, and inorganic parameters. A Groundwater Monitoring plan with a total of 5 wells, 1 upgradient, 2 cross gradient, 1 down gradient, and 1 at source (Additional wells may be necessary) will be submitted for approval, and Groundwater monitoring will continue until 4 clean consecutive quarters is achieved. COGCC will be provided a 48 Hour notice prior to the installation of Monitoring wells. Boring logs and monitoring well construction logs will be completed for each well and submitted in a supplemental Form 27.

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: \$ 15000 _____

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 reuse.

Volume of E&P Waste (solid) in cubic yards _____ 170

E&P waste (solid) description Non-hazardous E&P waste

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: _____

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 sampling 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. 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. 04/03/2023

Proposed date of completion of Reclamation. 09/03/2023

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. 09/17/2022

Actual Spill or Release date, or date of discovery. 09/16/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/06/2023

Proposed site investigation commencement. 02/06/2023

Proposed completion of site investigation. 03/06/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/06/2023

Proposed date of completion of Remediation. 04/03/2023

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 presents a summary of remedial activities and soil analytical data collected to date and a work plan to continue site investigation following the discovery of soil that does not meet soil suitability for reclamation standards. All hydrocarbon impacts have been removed and no metals impacts to soil as a result of the release have been identified. Additional source removal, background evaluation, and site investigation are needed to evaluate the full extent of impacts and to potentially investigate for groundwater impacts.

Waste disposal documentation will be provided in a supplemental form 19.

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

Signed: Kevin Tautkus

Title: Project Manager

Submit Date: 12/20/2022

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: 02/28/2023

Remediation Project Number: 27845

COA Type

Description

	<p>Per the attached figure only half of the excavation has been sampled despite the Operator indicating all hydrocarbon impacts have been removed.</p> <p>Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document.</p>
	<p>Operator has not provided a discussion/documentation to support Operator comment. "All hydrocarbon impacts have been removed and no metals impacts to soil as a result of the release have been identified. Additional source removal, background evaluation, and site investigation are needed to evaluate the full extent of impacts and to potentially investigate for groundwater impacts."</p> <p>Operator shall provide a detailed analysis of the source sample and background source sample and develop a list of contaminant of concerns for this spill.</p>
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.

<u>Att Doc Num</u>	<u>Name</u>
403265888	FORM 27-INITIAL-SUBMITTED
403265991	ANALYTICAL RESULTS
403265992	ANALYTICAL RESULTS
403265994	ANALYTICAL RESULTS
403265998	SITE MAP
403266001	MAP
403266004	SOIL SAMPLE LOCATION MAP

Total Attach: 7 Files

General Comments

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

Total: 0 comment(s)