

# State of Colorado Energy & Carbon Management Commission

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Receive Date:

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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>(720) 8689848</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>John Peterson</u>	Email: <u>jpeterson@kpk.com</u>	Mobile: <u>(303) 5508872</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20310 Initial Form 27 Document #: 402824813

#### 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>480251</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UPRR 42 PAN AM AE #2</u>	Latitude: <u>40.092035</u>	Longitude: <u>-104.924641</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>31</u>	Twtp: <u>2N</u>	Range: <u>67W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

#### SITE CONDITIONS

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

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**

Two domestic water wells are located within 1/4 mile of the site. One domestic water well is located 154' SW and one 375' N of the site. No mapped wetlands are located within 1/4 mile of the site. No critical habitats are located within 1/4 mile of the site. 2 stormwater retention basins are located within 1/4 mile of the site (north of the site). Single-family residences are located adjacent to the north, south, and west of the site, and single-family residences are located across the right-of-way for Ridgeway Boulevard to the east.

**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	TBD	Laboratory Analytical

**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 updates on a spill that occurred at the UPRR 42 PAN AM AE #2 off-site flowline when a gasket seal on a riser leaked. KPK has since repaired the damaged gasket seal and excavation approximately 1-foot of soil on the surface around the release point. In accordance with COGCC Rule 911.a, soil samples were 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 the soil around the release was conducted after the excavation activity.

**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 ):

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, 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).

**Proposed Groundwater Sampling**

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

Groundwater was not encountered during the excavation and site assessment activity.

**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 ):

Based on the analytical results from the initial confirmation samples collect, additional excavation activity is need to further delineated the extent of impacts in the vicinity of SB-5@1. Additional 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, 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). Background soil samples will be collected and analyzed for Table 915-1 Metals and Table 915-1 Soil Suitability for Reclamation.

**SITE INVESTIGATION REPORT**

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 10

Number of soil samples exceeding 915-1 10

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

Approximate areal extent (square feet) 100

### NA / ND

NA Highest concentration of TPH (mg/kg) \_\_\_\_\_

NA Highest concentration of SAR \_\_\_\_\_

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 1

### 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 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

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 soil samples will be collected and analyzed for Table 915-1 Metals and Table 915-1 Soil Suitability for Reclamation.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 290

Volume of liquid waste (barrels) 0

Is further site investigation required?

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, 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). At a minimum, one sample will be collected from each side of the excavation walls as well as from the base of the excavation area. If needed, extent borings may be installed and soil samples collected to evaluate the extent of soil impacts. Background soil samples will be collected and analyzed for Table 915-1 Metals and Table 915-1 Soil Suitability for Reclamation.

## 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.

The source of the impacts was already shut in when the release was discovered. Free product was removed utilizing a Hyrdovac, and excavation commenced to eliminate hydrocarbons across the site. All impacted soil was be excavated and hauled to a certified disposal location. Waste disposal manifests are provided in the attachments.

### 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.

Potential impacts that meet the criteria in Rule 912.b were reported in accordance with Rule 912.b in a Form 19 (402737630). Sampling at the release location was conducted on 1/27/2023 with a hand auger at depths of 1-foot and 5-foot below ground surface in accordance to 911.a after excavation activity was completed. Soil sample locations and results are included in the attachments. E&P waste was transported and disposed at a certified disposal facility, copies of waste records and the manifest are included in the attachments. Additional excavation will be performed to remove impacted soil from the release location. Impacted soil will be brought to 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) \_\_\_\_\_ 290

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

Groundwater was not encountered during the site assessment and excavation activity.

# 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 of soil and groundwater

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 290

E&P waste (solid) description \_\_\_\_\_ Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_ Waste Connections Inc

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 sampling analytical that shows all impacts have been removed, KPK will submit request for Backfill to the state. 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? No

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? No

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/01/2023

Proposed date of completion of Reclamation. 10/02/2024

## 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. 07/03/2021

Actual Spill or Release date, or date of discovery. 07/03/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/01/2021

Proposed site investigation commencement. 11/07/2022

Proposed completion of site investigation. 11/01/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/30/2023

Proposed date of completion of Remediation. 11/30/2024

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:

Confirmation samples were collected according to the original implementation schedule. Additional site assessment activity is needed.

**OPERATOR COMMENT**

A Form 27-Supplemental updates will be submitted to the COGCC when the extent of soil impacts have been fully delineated.

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

Signed: John Peterson

Title: Director EHS & Compliance

Submit Date: 08/18/2023

Email: jpeterson@kpk.com

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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 20310

**COA Type****Description**

0 COA	
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**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**

403445066	FORM 27 DENIED
403489760	OTHER
403513273	FORM 27-SUPPLEMENTAL-SUBMITTED
403513274	DENIED FORM 27 DENIED

Total Attach: 4 Files

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

Environmental	<p>ECMC has not conducted a thorough review of this form as it provided inaccurate information:</p> <p>Per the previously submitted form dated 10/18/2022, and in correlation with ECMC site visits and publically available aerial imagery, no excavation has occurred at this location. Attached waste manifests are for a different incident with a similar name.</p> <p>Operator is directed to provide correct information, conduct a thorough QAQC, and resubmit the form.</p>	08/28/2023
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Total: 1 comment(s)