

State of Colorado Energy & Carbon Management Commission

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Document Number:

403516143

Receive Date:

08/30/2023

Report taken by:

Laurel Anderson

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) 868-9848</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		Mobile: <u>(303) 550-8872</u>
Contact Person: <u>John Peterson</u>	Email: <u>jpeterson@kpk.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 31902 Initial Form 27 Document #: 403516143

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

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-09018</u>	County Name: <u>WELD</u>
Facility Name: <u>UPRR 43 PAN AM B 7</u>	Latitude: <u>40.085367</u>	Longitude: <u>-104.996696</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>3</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>318400</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>UPRR 43 PAN AM B-61N68W 3NWNW</u>	Latitude: <u>40.085367</u>	Longitude: <u>-104.996696</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>3</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: OFF-LOCATION FLOWLINE	Facility ID: 475439	API #:	County Name: WELD
Facility Name: Wellhead Line 3NWNW	Latitude: 40.085000	Longitude: -104.996540	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNW	Sec: 3	Twp: 1N	Range: 68W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use non-crop land

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 10-12 residential/commercial occupied buildings with 1/4 mile of the site. State Hwy 52 is approximately 800' miles north of the site, County Road 7 is roughly 633' south of the site, and County Road 7 is 600 feet west of the site. There are 2 water wells within 1/4 mile (approximately 950 feet south and 950 southeast of site) and the closest bald eagle nest boundary is 0.6 miles northwest of the site. The closest wetlands area is roughly 1,100' southeast of the site.

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	Field inspection/soil sampling/laboratory analysis

INITIAL ACTION SUMMARY

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

This form has been prepared to provide notice of the decommissioning of the UPRR 43 PAN AM B #7 wellhead, flowline facility and tank battery Location ID 318400 (Facility #1). Visual inspection and field screening of soils will be conducted following decommissioning operations. Soil and groundwater (if present) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with ECMC Table 915-1. A topographic Site Location Map is attached.

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 decommissioning activities, soil will be field screened at the associated wellhead, flowline, and Facility #1 infrastructure. If impacted soils are encountered, characterization samples will be collected from the area(s) exhibiting the highest degree of impacts based on visual, olfactory, and/or field screening observations. If impacts are not observed, soil samples will be collected from the ground surface and excavations associated with the former wellhead, flowline and tank battery facility infrastructure and/or the area(s) most likely to have been impacted during the operational life of the facility. Soil samples will be submitted for laboratory analysis using ECMC-approved methods appropriate for detecting contaminants of concern in ECMC Table 915-1. Proposed soil sample and screening locations are attached.

Proposed Groundwater Sampling

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

If groundwater is encountered during wellhead facility decommissioning activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (1,2,4 – TMB), and 1,3,5-trimethylbenzene (1,3,5 – TMB), using ECMC-approved methods appropriate for detecting contaminants of concern in ECMC Table 915-1.

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, soil samples will be submitted for laboratory analysis of ECMC Table 915-1 organic compounds, total petroleum hydrocarbons (TPH) [C6-C36], and Soil Suitability for Reclamation parameters (pH, electrical conductivity [EC], sodium adsorption ratio [SAR], and boron). If field screening or analytical results indicate that impacts are present, soil samples will be analyzed for the full list of ECMC Table 915-1 contaminants of concern. Field screening data, sample location coordinates, and photographic logs will be provided in a subsequent Form 27-Supplemental document.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

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)

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 encountered, contaminated soils will be removed and transported off-site to a licensed disposal 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.

If reportable impacts to soil or groundwater are encountered, as defined in Rule 912.b., a site-specific remediation plan will be developed and submitted to the ECOM via supplemental Form 27. If reportable impacts are not encountered, a supplemental Form 27 will be submitted requesting closure within 90 days following completion of sampling/assessment activities.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation (or enhanced bioremediation)

Chemical oxidation

Air sparge / Soil vapor extraction

Natural Attenuation

Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards)

Name of Licensed Disposal Facility or COGCC Facility ID #

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.

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 ECMC rules. The cost for remediation is a preliminary estimate only and is based only on analytical costs to conduct closure sampling at this time, costs may change upwards 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: \$ 3500

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 ECMC 1000 Series Reclamation Rules.

Is the described reclamation complete? _____

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/27/2023

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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 serves as notification for the decommissioning of the UPRR 43 PAN AM B #7 wellhead, flowline facility and tank battery Location ID 318400 (Facility #1). Decommissioning activities are planned to begin the week of September 25, 2023, which may be adjusted due to unforeseen circumstances, land access, and/or weather delays.

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

Signed: Katherine Kahn

Title: Senior Hydrogeologist

Submit Date: 08/30/2023

Email: kkahn@cdhconsult.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: Laurel Anderson

Date: 10/03/2023

Remediation Project Number: 31902

COA Type**Description**

	If Operator proposes to address Spill/Release ID #484038 under this Remediation Project, then Operator shall add the Spill/Release ID under the site information section and select Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912. under the purpose information section on the subsequent Supplemental Form 27.
	Flowline decommissioning described in the subject form is unclear. Operator shall describe planned decommissioning activities for all on and off-location flowlines associated with this remediation project and submit all required Form 42 and Form 44's (see following COAs.
	Operator will submit a Form 42 for pre-abandonment notice pursuant to Rule 1105.d. A Form 42 will be filed prior to starting flowline abandonment, and will be included in the Related Forms in a supplemental Form 27. Abandonment will occur per the requirements of Rule 1105. During flowline abandonment, any liquids evacuated from the flowline will be contained and disposed per the requirements of Rule 905. Note: Approval of this Form 27 does not imply approval of pre-abandonment required by Rule 1105.d. Additionally, on the subsequent Supplemental Form 27 following on-location flowline abandonment, Operator shall provide the associated Form 42 – Abandonment of Flowlines Verification Report document number required by Rule 1105.f.(1).
	Operator will submit a Form 44 Pre-abandonment notice for each off-location flowline pursuant to Rule 1105.d. A Form 44 will be filed prior to starting flowline abandonment, and will be included in the Related Forms in a supplemental Form 27. Abandonment will occur per the requirements of Rule 1105. During flowline abandonment, any liquids evacuated from the flowline will be contained and disposed per the requirements of Rule 905. Additionally, on the Form 27 Supplemental, Operator shall include the associated Form 44 Flowline Abandonment Verification Report document numbers required by Rules 1105.f.(2)
	Note: COA on Form 6 (Doc #403283252) states: "Consistent with Rule 911.a, a Form 27 must be approved prior to cut and cap, conducting flowline abandonment, or removing production equipment. Allow 30 days for Director review of the Form 27; include the Form 27 document number on the Form 44 for offsite flowline abandonment (if applicable) and on the Form 6 Subsequent. Properly abandon flowlines per Rule 1105. If flowlines will be abandoned in place, include with the Form 27: pressure test results conducted in the prior 12 months as well as identification of any document numbers for a COGCC Spill/Release Report, Form 19, associated with the abandoned line."
	Operator states: "Decommissioning activities are planned to begin the week of September 25, 2023, which may be adjusted due to unforeseen circumstances, land access, and/or weather delays.". Per Rule 911.a.(1): Operators will obtain the Director's approval of the Form 27 prior to conducting any investigation or closure operations. Additionally, Rule 913.d.(2). requires Operator submit a Supplemental Form 27 with an updated implementation schedule at least 14 days in advance of any schedule changes.

	Operator shall complete all field work, and submit all samples for laboratory analysis, within 45 days of the date of ECMC approval of the subject Form 27. Additionally, Operator shall submit a supplemental Form 27 within 45 days from the date laboratory analytical data is received.
	ECMC does not approve Operator's proposed sampling plan. Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze all soil and groundwater samples for all Table 915-1 contaminants of concern
	Distances provided for other potential receptors within 1/4 mile are incorrect. Operator shall review and update potential receptors as needed on the subsequent Supplemental Form 27.
9 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>
403516143	FORM 27-INITIAL-SUBMITTED
403516524	MAP
403516525	SOIL SAMPLE LOCATION MAP

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Based on the scope of work proposed ECMC does not believe Operator anticipated the remaining cost for this project is adequate.	10/03/2023

Total: 1 comment(s)