

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

403442147

Receive Date:

06/22/2023

Report taken by:

Jason Kosola

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: KINDER MORGAN CO2 COMPANY LLC	Operator No: 46685	Phone Numbers
Address: 1001 LOUISIANA ST SUITE 1000		Phone: (970) 882-5532
City: HOUSTON	State: TX	Zip: 77002
Contact Person: Michael Hannigan	Email: co2source_regulatory@kindermorgan.com	Mobile: (970) 403-9501

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15551 Initial Form 27 Document #: 402396763

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: SPILL OR RELEASE	Facility ID: 471621	API #: _____	County Name: MONTEZUMA
Facility Name: Yellow Jacket Produced Water Pump 103B	Latitude: 37.470397	Longitude: -108.790697	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 13	Twp: 37N	Range: 18W
Meridian: N	Sensitive Area? Yes		

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use crop and livestock production

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

Other Potential Receptors within 1/4 mile

None

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	6' wide x 15' long x 1.5' deep	Soil sampling and observation

INITIAL ACTION SUMMARY

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

Upon discovery of the release of 111 barrels of produced water, the pump and associated piping were isolated. Produced water (72 barrels) was recovered from two (2) of the three (3) secondary containment areas and the sumps. Initial assessment of the impact of the spill included laboratory analysis of soil samples collected from three (3) separate areas: Two (2) soil samples were collected from spill area #1 (adjacent to the produced water pump curbed concrete containment); two (2) soil samples were collected from spill area #2 (adjacent to the glycol pump curbed concrete containment); and one (1) soil sample was collected from spill area #3 (inside the secondary containment of the blowdown tank). Results of the initial sampling showed that Table 910-1 screening levels were not exceeded in samples collected from spill areas #1 and #2. The analytical results of the sample collected from spill area #3 yielded a concentration of TPH (870.3 mg/kg) that exceeded the Table 910-1 screening level of 500 mg/kg.

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):

Two (2) confirmation soil samples were collected from spill area #3 which confirmed that TPH was still present in soil. Additional soil will be removed using an air spade, after which at least two (2) confirmation soil samples will be collected and submitted for analysis of the full Table 915-1 suite of compounds.

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

Number of soil samples collected 10

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 120

NA / ND

-- Highest concentration of TPH (mg/kg) 2476.4

-- Highest concentration of SAR 1.37

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 3

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 900

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?

Two (2) soil samples (YJBSS-1 and YJBSS-2) were collected from off-site undisturbed native soil to obtain background concentrations of EC, SAR, pH and arsenic. The analytical results for all soil samples are attached.

☐ 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

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 soil impacted by the spill will be removed from inside the blowdown tank secondary containment wall using an air knife and vacuum truck, then transported to a permitted E&P waste disposal/treatment facility.

REMEDIAL ACTION 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.

Remediation of soil impacted by the release of produced water will be accomplished by excavating the impacted soil and transporting it to a permitted disposal/treatment facility.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

☒ Ex Situ

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 8
_____ 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.

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 Progress and schedule of soil remediation project

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.

Document #403281001

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:

None

Volume of E&P Waste (solid) in cubic yards 3

E&P waste (solid) description TPH-impacted soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Industrial Ecosystems, Inc. (Aztec, NM)

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?

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 remediation area is located inside the secondary containment walls of a process tank at the Yellow Jacket Compressor Plant, therefore there is no reclamation or re-vegetation required.

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. _____

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. 02/13/2020

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/13/2020

Proposed site investigation commencement. 02/13/2020

Proposed completion of site investigation. 11/17/2020

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/24/2023

Proposed date of completion of Remediation. 09/30/2023

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:

During the implementation of remediation for a different spill at the Yellow Jacket Compressor Plant, it was discovered that in-situ remediation by chem-ox injection at this location was not feasible due to the inability of the Geoprobe to access the proposed treatment area. The presence of buried process piping also was a factor in abandoning the proposed subsurface chem-ox injection remediation method. The only feasible method identified is excavation with off-site disposal using an air spade and vacuum truck.

OPERATOR COMMENT

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

Signed: Michael Hannigan

Title: EHS Supervisor

Submit Date: 06/22/2023

Email: michael_hannigan@kindermorgan.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: Jason Kosola

Date: 02/01/2024

Remediation Project Number: 15551

COA Type**Description**

0 COA	

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**

403442147	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403442361	ANALYTICAL RESULTS
403442363	SOIL SAMPLE LOCATION MAP
403442372	SOIL SAMPLE LOCATION MAP
403673659	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)