

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

403935325

Receive Date:

10/01/2024

Report taken by:

Alexander Ahmadian

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 ECOM 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: KP KAUFFMAN COMPANY INC	Operator No: 46290	Phone Numbers
Address: 1700 LINCOLN ST STE 4550		Phone: (720) 868-9848
City: DENVER	State: CO	Zip: 80203
Contact Person: John Peterson	Email: jpeterson@kpk.com	Mobile: (303) 550-8872

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25978 Initial Form 27 Document #: 403166227

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: TANK BATTERY	Facility ID: 482821	API #: _____	County Name: WELD
Facility Name: Koch Tank Battery	Latitude: 40.079624	Longitude: -105.037601	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 6	Twp: 1n	Range: 68w Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 483548	API #: _____	County Name: WELD
Facility Name: Koch Tank Battery	Latitude: 40.079578	Longitude: -105.037613	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 6	Twp: 1N	Range: 68W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 483852	API #:	County Name: WELD
Facility Name: Koch Tank Battery Separator		Latitude: 40.080040	Longitude: -105.037670
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENE	Sec: 6	Twp: 1N	Range: 68W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL	Most Sensitive Adjacent Land Use Open space
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

Approximately 8 habitable structures are within ¼ mile of the Koch Tank Battery. County Road 3 is 80 feet to the east; Lower Boulder Ditch is roughly 125' northeast of the spill. High Priority habitats and 100-year floodplain are not present within ¼ mile; there is no Bald Eagle Roost site within a ¼ mile; there is no Bald Eagle Active Nest site within ½ mile. There are 4 wells within ¼ mile of the spill site. A Freshwater Emergent Wetland Habitat borders the northwest, west, southwest, and southeast boundaries of the Tank Battery, approximately 90' from the spill 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	GROUNDWATER	TBD	laboratory analytical results
Yes	SOILS	2350 ft2	laboratory analytical results

INITIAL ACTION SUMMARY

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

During P&A of the KOCH Tank Battery, associated onsite flowline, separator, & produced water vessel, historical crude oil & produced water impacts were noted. Soil was screened with a PID & confirmation soil samples were analyzed. Per the approved Form 271 prepared for this site (document #403166227), if impacts were not noted during field screening soil samples were submitted for laboratory analysis of BTEX, TMBs, naphthalene, TPH, pH, specific conductance (EC), SAR, & boron. If impacts were detected, soil samples were analyzed for the full COGCC Table 915-1 analytical suite.

Field screening reported impacts by the crude & produced water tanks. Soil excavation occurred at the tanks in Fall 2022 & Winter 2024. Approximately 835 yds3 of soil were excavated from 11/19/22 through 12/15/22 & 104 yds3 were excavated on 2/15/24 & properly disposed of at Front Range Landfill in Erie, CO. Sidewall & floor samples were submitted for Table 915-1 analysis in 12/22 & 2/24. 1-methylnaphthalene, SAR, & pH exceeded Table 915-1 levels & site-specific levels in the remaining soil. 1-methylnaphthalene & naphthalene reporting limits were above the Protection of Groundwater Soil Screening Levels, so the Minimum Detection Limits were reported for 12/22 samples. Groundwater was noted in the excavation & a grab groundwater sample was submitted for BTEX, TDS, chloride & sulfate analysis. Chloride & sulfate exceeded Table 915-1 levels in the groundwater.

Six samples were submitted along flowline for limited Table 915-1 since field screening did not report impacts. Analytical results from sample SS-1@2' reported impacts so additional excavation and sampling occurred. Sample SS-1@3' was submitted for the full Table 915-1 analysis on 1/27/23 and resampled on 2/15/24. Benzo(a)anthracene, SAR, & pH exceeded Table 915-1 levels & site-specific levels in the remaining soil.

Excavations were backfilled in February 2024. Figures, tables, field notes & 2024 manifests are 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):

SS-1@3' and BH-5@6' will be resampled, and four soil samples will be collected surrounding SS-1 at 3' bgs to ensure impacts were removed. All 6 samples will be analyzed for full Table 915-1 analysis.

BH-1@6', BH-2@6', BH-4@6', SW-7@4' and SW-16@4' will be resampled for naphthalene due to detection limit issues in samples collected in 12/22. BH-1@6' will also be resampled for SAR and pH to confirm levels. All other compounds in these 5 samples were below the Table 915-1 soil screening levels.

Proposed Groundwater Sampling

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

One grab groundwater sample will be collected from BH-5 and submitted for Table 915-1 analysis. A second grab groundwater sample from Background-3 will be submitted for Table 915-1 inorganics to establish site-specific levels.

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 35

Number of soil samples exceeding 915-1 32

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

Approximate areal extent (square feet) 2350

NA / ND

-- Highest concentration of TPH (mg/kg) 936

-- Highest concentration of SAR 19.9

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 6

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 1

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 1.2

-- Highest concentration of Xylene (µg/l) 6.59

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?

The soil source sample exceeded Table 915-1 levels for 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, 1-methylnaphthalene & 2-methylnaphthalene. SS-1@2' exceeded the TPH Table 915-1 standard. Soil surrounding both samples was excavated & disposed of offsite. SS-1@3', submitted after excavation, exceeded the Table 915-1 standard for benzo(a)anthracene in 1/23 and 2/24. 1-methylnaphthalene slightly exceeded at BH-5@6'.

Arsenic, barium, lead and selenium exceeded Table 915-1 levels in multiple samples, but were below establish site-specific background concentration levels (SSBLs) in all samples.

SAR and pH exceeded Table 915-1 in multiple samples; however, SAR and pH only exceeded established SSBLs at BH-1@6'.

Groundwater sampled from the excavation exceeded Table 915-1 levels for chloride & sulfate.

☒ Were background samples collected as part of this site investigation?

6 background samples were collected at depths of 4' and 6' bgs from 3 locations surrounding the Koch Tank Battery. 5 samples were submitted from 4 locations at Kenneth E Koch (located <1/4-mile N of site). 20 samples from 16 locations at Koch 41-6 (located <1/2-mile N of site) were submitted. Boring logs from Koch 41-6 report soil as consistently fine-grained sand with trace clay from ground surface to 10' bgs. Background & Closure Samples from Kerr McGee Koch Kenneth E A1 O SA Hist Release (Remediation #25626) were also used. All samples analyzed for Table 915-1 inorganics. Results from 37 samples used to establish site-specific background concentration levels (SSBLs). 2 samples from Background-14 location not used due to location's proximity to previous operations. As, Ba, Cd, Pb, Se, EC, pH, SAR & boron exceeded Table 915-1 levels. SSBLs established for metals by multiplying highest background result times 1.25 per Table 915-1 Footnote 1.

☐ 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?

SS-1@3' and BH-5@6' will be resampled, and four soil samples will be collected surrounding SS-1 to ensure impacts have been removed. All 6 samples will be analyzed for full Table 915-1 analysis.

BH-1@6', BH-2@6', BH-4@6', SW-7@4' and SW-16@4' will be resampled for naphthalene due to detection limit issues in samples collected in 12/22. BH-1@6' will also be resampled for SAR and pH to confirm levels. All other compounds in these 5 samples were below the Table 915-1 soil screening levels.

One grab groundwater sample will be collected from BH-5 and submitted for Table 915-1 analysis.

A second grab groundwater sample from Background-3 will be submitted for Table 915-1 inorganics to establish site-specific levels.

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.

Approximately 835 yds3 of soil were excavated from the tank battery, associated onsite flowline, separator, and produced water vessel from 11/19/22 through 12/15/22 and an additional 104 yds3 were excavated in February 2024. All impacted soil was properly disposed of at Front Range Landfill in Erie. Manifests from 2022 were attached to Document #403441191. Manifests from 2024 are attached to this form. Excavations were backfilled in February 2024.

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.

The source soil sample exceeded Table 915-1 levels for 1,2,4-TMB, 1,3,5-TMB, naphthalene, TPH, 1-methylnaphthalene & 2-methylnaphthalene. SS-1 @2' exceeded the TPH Table 915-1 level. Soil surrounding both samples was excavated. SS-1 @3', submitted after excavation, exceeded the standard for benzo(a)anthracene in 1/23 & 2/24. 1-methylnaphthalene slightly exceeded at BH-5 @6'. SS-1 @3' & BH-5 @6' will be resampled, & 4 soil samples will be collected surrounding SS-1 at 3' bgs to ensure impacts were removed.

BH-1 @6', BH-2 @6', BH-4 @6', SW-7 @4' & SW-16 @4' will be resampled for naphthalene due to detection limit issues in samples collected in 12/22 to ensure impacts are not present.

Results from 37 background samples collected at Kenneth E Koch #1, Koch 41-6 & Koch Tank Battery (within 1/2 linear mile) were used to establish site-specific background concentration levels (SSBLs). Boring logs at Koch 41-6 report soil as consistently fine-grained sand with trace clay from ground surface to 10' bgs. Since lithology did not vary with depth & all samples were collected within top 6' of soil, established SSBLs were not depth-specific. All metals were below established SSBLs. SAR & pH exceed SSBLs at BH-1 @6' so location will also be resampled to confirm levels. All other compounds in these 5 samples were below Table 915-1 levels. More excavation may be required.

1 grab GW sample will be collected from BH-5 & submitted for Table 915-1 analysis since naphthalene, 1,2,4-TMB & 1,3,5-TMB were not originally analyzed in the GW. The Form 27 Initial approved for decommissioning work did not require analysis of inorganics; however, chloride & sulfate exceeded Table 915-1 levels. A 2nd grab GW sample from Background-3 will be submitted for Table 915-1 inorganics to establish site-specific levels for comparison to chloride & sulfate levels detected in GW-1 collected in 12/22. If GW impacts are reported, the extent of impacts will be defined, & remediation alternatives will be evaluated.

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)

939

Name of Licensed Disposal Facility or ECMC Facility ID #

Excavate and onsite remediation

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.

GW-1 was submitted from the excavation in 12/22 and analyzed for BTEX, TDS, chloride and sulfate. One grab groundwater sample will be collected from BH-5 within the excavation and submitted for full Table 915-1 analysis since naphthalene, 1,2,4-TMB and 1,3,5-TMB were not originally analyzed in the groundwater. The Form 27 Initial approved for the decommissioning work did not require analysis of inorganics; however, chloride and sulfate exceeded Table 915-1 levels. A second grab groundwater sample from Background-3 will be submitted for Table 915-1 inorganics to establish site-specific levels for comparison to chloride and sulfate levels detected in GW-1 collected in 12/22.

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.

- Project is 90% complete. Additional soil and groundwater sampling are required.

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 939

E&P waste (solid) description Petroleum impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Front Range Landfill

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description NA

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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? No

Is additional groundwater monitoring to be conducted? Yes

Operator shall comply with the ECMC 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.

Excavations surrounding the tank battery, associated onsite flowline, separator, and produced water vessel was backfilled to grade in February 2024 using 360 yds³ of clean fill purchased from Front Range Landfill. Clean fill manifests are attached. The soil was compacted by driving over the filled excavation with equipment. Stormwater best management practices are implemented instead of reseeding. The landowner will be developing the site and will be excavating, replacing, and compacting all soil at the site for geotechnical engineering purposes prior to construction.

Is the described reclamation complete? Yes

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. 02/19/2024

Proposed date of completion of Reclamation. 12/20/2024

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. 02/13/2024

Actual Spill or Release date, or date of discovery. 12/05/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/19/2022

Proposed site investigation commencement. 12/05/2022

Proposed completion of site investigation. 11/30/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/19/2022

Proposed date of completion of Remediation. 02/15/2024

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:

OPERATOR COMMENT

Please see attached COA response spreadsheet for KPK's actions based on previous COAs for the site.

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

Signed: Katherine Kahn, P.G.

Title: Senior Hydrogeologist

Submit Date: 10/01/2024

Email: kk@ResolutionConsultantsLLC.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Alexander Ahmadian

Date: 12/30/2024

Remediation Project Number: 25978

COA Type**Description**

	Operator submitted this form outside of the approved reporting schedule (Quarterly). In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days); additional violations may result in enforcement.
	Due to the presence of impacted soil in contact with groundwater (groundwater observed within the excavation) Operator shall: - Comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations. - Operator will install monitoring wells (within the spill/release area, cross-gradient, down-gradient, and up-gradient) to properly characterize groundwater pursuant to Rule 915 and determine hydraulic gradient, as required by Rule 915.e.(3)A.ii. All monitoring wells shall be constructed as permanent monitoring wells in accordance with the State Engineer's Water Well Construction and Permitting Rules - Operator will analyze groundwater samples from all monitoring wells for Table 915-1 organic and inorganic parameters for a minimum of four quarterly monitoring events.
	Operator's provided Implementation schedule indicates a date for completion of remediation that predates this form, yet this form indicates that there is additional investigation required. Operator shall update the Implementation Schedule in accordance with Rule 913.d.
3 COAs	

ATTACHMENT 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**

403935325	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403939675	DISPOSAL MANIFESTS
403939677	MAP
403939679	ANALYTICAL RESULTS
403939681	ANALYTICAL RESULTS
403939706	OTHER
403939809	OTHER
404043141	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

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

Environmental	All COA's and CA's from previous forms still apply.	12/30/2024
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Total: 1 comment(s)