

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402843899
Receive Date:
10/15/2021

Report taken by:
PETER GINTAUTAS

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>	Phone Numbers
Address: <u>1675 BROADWAY, STE 2800</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Ray Gorka</u>	Email: <u>rgorka@kpk.com</u>	Phone: <u>(303) 8254822</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 13908 Initial Form 27 Document #: 402126714

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>464277</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Parker #44-15</u>	Latitude: <u>40.132730</u>	Longitude: <u>-104.869960</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>15</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 SM Most Sensitive Adjacent Land Use Confined feeding operations

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? No

Other Potential Receptors within 1/4 mile

None

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X E&P Waste, X Produced Water, X Oil, Condensate, Drilling Fluids, Drill Cuttings, Other E&P Waste, Workover Fluids, Tank Bottoms, Pigging Waste, Rig Wash, Spent Filters, Pit Bottoms, Non-E&P Waste, Other (as described by EPA)

DESCRIPTION OF IMPACT

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Row 1: Yes, SOILS, 20' x 15' x 10', Current excavation limits

INITIAL ACTION SUMMARY

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

Leaking hydrocarbon storage tank has been disconnected and removed from service.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

X Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Soil screening using PID will be performed to establish horizontal and vertical extent of the historical contamination. Following clean field screening results from ambient temperature head space measurements within the excavation area, grab samples will be collected to verify the completion of excavation activities.

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

NA / ND

Number of soil samples collected 0

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

Number of soil samples exceeding 915-1 _____

-- Highest concentration of SAR _____

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

BTEX > 915-1 _____

Approximate areal extent (square feet) _____

Vertical Extent > 915-1 (in feet) _____

Groundwater

Number of groundwater samples collected 0

-- Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

-- Highest concentration of Toluene (µg/l) _____

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

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

Number of groundwater monitoring wells installed _____

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

Number of groundwater samples exceeding 915-1 _____

-- 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?

Limits of soil contamination, both horizontal and vertical, have not been established. Excavation will continue until limits are defined.

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.

All contaminated soil is being removed from the excavation area and disposed of at a certified 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.

Contaminated soil will be excavated removed from site. Final vertical and horizontal extent of excavation area will be based on results from collected grab soil samples. Excavation area will be backfilled with clean fill dirt.

As of 12/18/2019, horizontal limits of excavation extend to 36' x 27', with vertical depths ranging from 4' to 10'. Excavated material is currently being stockpiled on location until dump trucks are available to bring to Front Range Landfill. There has not been any samples collected or field screening performed to-date as presences of hydrocarbon odor still exists within the excavation area.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Yes Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 111

_____ 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

_____ 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 Quarterly Progress Report _____

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 _____ 0

E&P waste (solid) description Hydrocarbon contaminated soil

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 None

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? Yes _____

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.

Remediation area is at an active oil & gas location. Excavation area will be backfilled, recontoured, and reconstructed for facility operations.

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. 05/03/2019

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/03/2019

Proposed site investigation commencement. 05/03/2019

Proposed completion of site investigation. 12/31/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/18/2022

Proposed date of completion of Remediation. 12/26/2025

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

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

Signed: Ray Gorka

Title: Dir. Environ. Compliance

Submit Date: 10/15/2021

Email: rgorka@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: PETER GINTAUTAS

Date: 11/01/2021

Remediation Project Number: 13908

Condition of Approval

	<p>We are providing questions/suggestions to you as to how to possibly approach reconciling the available trucking records with actual volumes of E&P wastes removed. The documentation and records of work done will be used by you and COGCC in attempting to determine a best estimate of the volume of E&P waste generated and removed from the site. We will use the information Operator provides to evaluate any request for closure of the site investigation and remediation plan. There may be other questions we will ask as the review goes on. You may have suggestions that would help the process so please contact COGCC with suggestions concerns or questions. The final product of chronology and associated documentation will need to be attached to a supplemental form 27 so it can be part of the record for this remediation project. Please compile and submit a chronology of the activities conducted by Operator as part of the site investigation/remediation effort from August 6, 2020 to and including the date (s) upon which the excavation was backfilled. As per Rule 915.e(1)A. "Field Analysis. Field measurements and field tests will be conducted using appropriate equipment, calibrated and operated according to manufacturer specifications, by personnel trained and familiar with the equipment. Operators will provide all field measurements and tests to the Director upon request, including but not limited to field notes, field screening logs, soil boring logs, monitor well construction Logs, pump test reports, photographs, and soil vapor screening results." As part of the chronology please attach any field notes, field screening logs, photographs of the excavation and field tests including soil vapor screening measurements performed as part of the site investigation/remediation efforts during the period for which the chronology was requested even if previously provided (can be by referencing document numbers already in the COGCC document storage system). Operator generated work tickets or contractor work tickets from the time period of the chronology should be provided when pertinent to answer the questions of dates and volumes of materials removed from the Parker excavation. Provide your best estimate of the final dimensions of the excavation and volume of material disposed at landfill from the Parker excavation. One estimate of excavation size we have is that the extent was approximately 30 x 20 x 8 feet prior to final excavations at the site. That size estimate would account for approximately 165 cubic yards of excavated materials of which some or all may have been disposed at a landfill. Volumes of fill brought to the site may help in estimating final volume (dimensions) of the excavation. If you use that approach please document the fill process as part of the chronology.</p> <p>Rule 905.b. (including subsections describes how E&P Waste Transportation processes and also the tracking required by operators. Per rule 905.b.(3) the operator must record and document transportation offsite of E&P wastes. Waste Generator Requirements. Any Operator that generates E&P Waste that is transported off-site will maintain, for not less than 5 years, copies of each invoice, bill, or ticket, and such other records as necessary to document the requirements listed in Rules 905.b.(3).A–F. Such records will be signed by the transporter and provided to the Director upon request.</p> <p>A. The date of the transport; B. The identity of the waste generator; C. The identity of the waste transporter; D. The location of the waste pickup site; E. The type and volume of waste; and F. The name and location of the treatment or disposal site.</p> <p>Operator stated that up to now you have not been able to identify all parts of the waste transport and disposal documentation (in your records) required by Rules 905.b. (3).A–F. As part of the chronology please address each date on which the Operator believes E&P wastes were trucked offsite during the period specified for the chronology. Clearly indicate what contemporaneous notes or records is the basis for your statements and provide copies or notes which the statements are based on. Provide estimated volumes of material for each date on which the operator states that E&P wastes were transported offsite and indicate how such estimates were made.</p>
	<p>Operator has in the past requested closure of this site investigation and remediation project, but has suggested implementation dates in the next four years, The data request below must be submitted no later than 31 December 2021, since the operator has had since 29 June, 2021 to compile the requested data on actions at the site and to collect waste disposal records as suggested below since the operator states they have not been able to locate specific manifests for disposal of E&P wastes from the site.</p>

	Passing the subject supplemental Form 27 serves to acknowledge receipt of the attached form by the COGCC and does not imply approval of any requests therein. COGCC's review of and response to such requests will be made separately and included as comments and conditions of approval to this supplemental form 27.
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3 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>
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402843899	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
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		Stamp Upon Approval
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Total: 0 comment(s)