

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402748591

Receive Date:

07/15/2021

Report taken by:

KRIS NEIDEL

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> | | Phone: <u>(303) 825-4822</u> |
| City: <u>DENVER</u> | State: <u>CO</u> | Zip: <u>80202</u> |
| Contact Person: <u>Max Knop</u> | Email: <u>mknop@kpk.com</u> | Mobile: <u>(720) 317-8161</u> |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11876 Initial Form 27 Document #: 401776946

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>441100</u> | API #: _____ | County Name: <u>JACKSON</u> |
| Facility Name: <u>SPILL/RELEASE POINT</u> | | Latitude: <u>40.781138</u> | Longitude: <u>-106.240976</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>SWNW</u> | Sec: <u>2</u> | Twp: <u>9N</u> | Range: <u>79W</u> |
| | | Meridian: <u>6</u> | Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Rangeland

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

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 | 200' x 10' | Visual and soil analysis |

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 the previous operator, Bonanza Creek, and while conducting routine inspections, a release was observed along a flowline right of way. Approximately 7.4 bbl of oil and produced water were discharged to the ground surface. The well was shut-in immediately to stop the release. Incident response personnel were contacted to cleanup the discharged oil/water. The ground was frozen and the fluid was pooled on the ground surface.

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):

KPK field screened the release location area October 2019. Field screening results from ambient temperature head space measurements within the release area showed elevated readings at 7 of the 11 screening locations. Summary of field screening results have been provided in the attached site map. Soil sampling was not conducted in October 2019 due to the elevated field screening results. Based results of the PID field screening, excavation is necessary to remove impacted soil associated the release. Final vertical and horizontal extent of excavation area will be based on results from collected grab soil samples. All soil samples will be analyzed COGCC Table 915-1.

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 4
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 2000

NA / ND

-- Highest concentration of TPH (mg/kg) 1000
NA Highest concentration of SAR
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soil with analytical results exceeding Table 915-1 thresholds will be excavated and disposed of at the Walden Land Treatment Facility.

REMEDICATION 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.

Area showing elevated readings from PID field screening will be excavated until total horizontal and vertical extent of the historical contamination is defined. Final vertical and horizontal extent of excavation area will be based on results from collected discrete soil samples. Discrete soil samples will be collected from the base and walls of the final area of excavation. Discrete soil samples will be collected from investigation area showing no elevated PID readings. All soil samples will be analyzed and verified compliant with COGCC Table 915-1.

Excavation activities are scheduled to begin July 2021 and will continue until confirmation samples can be collected.

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)
Name of Licensed Disposal Facility or COGCC Facility ID #
☐ 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

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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:

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.

Line was repaired and tested. Soil has been tilled periodically.

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? Yes

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

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. 03/12/2015

Actual Spill or Release date, or date of discovery. 03/12/2015

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/12/2015

Proposed site investigation commencement. 03/12/2015

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/12/2015

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

KPK is currently devoting its internal and third-party resources on remediation's that have designated "high priority" by KPK staff and conversations with COGCC personnel. The high priority projects that KPK is devoting the entirety of its resources on are project #'s 15771, 15811, 16029, 16131, 14048, 18594, 12158, and 18932. This project has been determined to be low risk to the health and safety of the environment and people, and thus has not had any progress in the 2nd quarter. Work will commence on this project once resources become available when the above-mentioned projects are completed.

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

Signed: Max Knop

Title: Gen Manger of Air Quality

Submit Date: 07/15/2021

Email: mknop@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: KRIS NEIDEL

Date: 01/04/2022

Remediation Project Number: 11876

Condition of Approval**COA Type****Description**

| | |
|--------|---|
| | It appears that this form is being submitted as a quarterly update. |
| | see document 402531378 for COA's and review all COA's from approved forms, as no work has been done they are all still valid. |
| 2 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.

Att Doc Num**Name**

| | |
|-----------|--------------------------------|
| 402748591 | FORM 27-SUPPLEMENTAL-SUBMITTED |
|-----------|--------------------------------|

Total Attach: 1 Files

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

| | | |
|---------------|---|------------|
| Environmental | It appears that no work has been done since 2018. | 01/04/2022 |
|---------------|---|------------|

Total: 1 comment(s)