

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403046549
Receive Date:
05/11/2022

Report taken by:
Candice (Nikki) Graber

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>1700 LINCOLN ST STE 4550</u>		Phone: <u>(970) 237-1415</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		Mobile: <u>()</u>
Contact Person: <u>Levi Kirk</u>	Email: <u>PrimaryContractor@marcomllc.net</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20120 Initial Form 27 Document #: 402795971

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>480127</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>RMF Consolidation Line</u>	Latitude: <u>40.071160</u>	Longitude: <u>-104.900010</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>9</u>	Twp: <u>1N</u>	Range: <u>67W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use dry land ag/pasture
 Is domestic water well within 1/4 mile? No 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

Potential wetlands to south

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	300 yards	Measurement of excavation

INITIAL ACTION SUMMARY

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

The flowline has been repaired and KPK believes the impacted soil has been removed at this time. Lab samples have shown non-detect for all organics and nor inorganic exceedances of table 915 except for SAR. KPK is currently investigating if high SAR is naturally occurring or more excavation will need to be done. The excavation was field screened by MarCom personnel on 11/9/2022, and was determined further excavation was required. Further excavation was conducted, and following a 48hr COGCC notification, soil confirmation samples were collected on 1/20/2022, and analytical from this sampling event exceeding table 915.1 limits (See attachments).

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):

Sampling was conducted following a 48 notice provided to COGCC. Sampling followed the COGCC table 915.1 guidances. Following initial confirmation sampling, additional excavation is required. Additionally a site specific at depth background plan has been submitted for approval.

Proposed Groundwater Sampling

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

[Empty text box for groundwater sampling details]

Proposed Surface Water Sampling

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

[Empty text box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

[Empty text box for additional investigative actions]

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 14
Number of soil samples exceeding 915-1 10
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 800

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 3.26
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 8

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?

Background samples were taken for Arsenic due to anticipated high naturally occurring background concentrations. Highest result is excavation was 7.63mg/kg which is below 1.25x background (BG2 6.74x1.25=8.42mg/kg). KPK will be investigating SAR background concentrations. Additionally site specific at depth backgrounds will be collected using a Geoprobe. All boring will be geologically logged.

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?

Site specific backgrounds will be collected.

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.

Impacted soil will be removed with an excavator, line will be repaired and capped. Impacts will be removed until confirmation samples are below COGCC limits. Impacted soils will be disposed of at approved landfill 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.

The flowline has been repaired and KPK believes the impacted soil has been removed at this time. Lab samples have shown non-detect for all organics and nor inorganic exceedances of table 915 except for SAR. KPK is currently investigating if high SAR is naturally occurring or more excavation will need to be done. The excavation was field screened by MarCom personnel on 11/9/2022, and was determined further excavation was required. Further excavation was conducted, and following a 48hr COGCC notification, soil confirmation samples were collected on 1/20/2022, and analytical from this sampling event exceeding table 915.1 limits (See attachments).

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation) Yes _____ Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

If Yes: Estimated Volume (Cubic Yards) 275
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
 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Hydrocarbon impacted soils

Volume of E&P Waste (solid) in cubic yards 275

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Connections

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

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION 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? _____

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.

Reclaim in accordance with 1100 series rules

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. 05/11/2022

Proposed date of completion of Reclamation. 07/15/2022

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. 06/02/2021

Actual Spill or Release date, or date of discovery. 06/02/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/02/2021

Proposed site investigation commencement. 09/30/2021

Proposed completion of site investigation. 06/30/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2021

Proposed date of completion of Remediation. 06/30/2022

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 is being submitted in efforts to move forward with site specific at depth backgrounds. Maps, and additional attachments will be submitted with the next supplemental form 27 as per discussion with COGCC staff.

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

Signed: Levi Kirk

Title: Project Manager

Submit Date: 05/11/2022

Email: PrimaryContractor@marcomllc.net

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: Candice (Nikki) Graber

Date: 05/13/2022

Remediation Project Number: 20120

Condition of Approval

COA Type

Description

	Analytical data indicates arsenic, barium, cadmium, lead, nickel and selenium in multiple soil samples onsite exceed Table 915-1 Protection of Groundwater Soil Screening Level Concentrations and are greater than 1.25 times the concentration in the background sample(s) with the highest respective concentration.
	Per Rule 1102.o.(2)A. Operator shall submit a Form 44 (within 120 days of applying OOSLAT) identifying the off-location flowline/segment thereof that has been taken out of service and the outcome of the most recent integrity management test. Operator shall provide this Form 44 as an associated form on the next Form 27.
	Per CA on field inspection document 690102501 the following CA's remain unresolved: -Operator shall address the measures taken to prevent a recurrence of failure (1102.i Corrosion Control) -Operator shall provide a description of flowline repair/replacement work completed (1102.j. Repair)
	All unaddressed COAs/CAs from previously approved forms/inspections still apply. Additionally, all COAs applied to the GRIP apply to this remediation project.
4 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

403046549	FORM 27-SUPPLEMENTAL-SUBMITTED
403046550	ANALYTICAL RESULTS
403046551	ANALYTICAL RESULTS
403046552	ANALYTICAL RESULTS

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Spill is located within a 100-year floodplain, spill is located <100' from Big Dry Creek and a Freshwater Emergent National Wetland	05/12/2022
Environmental	<p>Analytical data indicates pH in multiple confirmation soil samples onsite exceed Table 915 -1 soil suitability levels for reclamation. Removal of additional soils followed by sampling and analysis are a path the Operator may choose.</p> <p>If the Operator proposes to leave material with elevated levels of pH in situ, the Operator will provide a detailed Reclamation plan that includes, but is not limited to, soil analysis from adjacent undisturbed lands, revegetation techniques, site stabilization, and details of seeded species. Operator will submit such a Reclamation plan on a Form 27 Supplemental Report for Director review.</p>	05/12/2022

Total: 2 comment(s)