



Advanced Technologies  
Waste Management Support  
Environmental Services  
Staff Augmentation

Native American and Women Owned  
8(a) Small Business

COR-KPK-002.2205

5/27/2022

Re: KPK George Norden, Remediation # 19716

Ms. Graber:

In the Compliance Plan Agreement (CPA) between K.P. Kauffman (KPK) and Colorado Oil and Gas Conservation Commission (COGCC), KPK is to comply with Conditions of Approval (COAs) referred to in Document Nos 402923334 approved on February 3, 2022. This letter is to address these COAs.

In the Document Number 402923334, the following COAs have been applied, followed by MarCom/KPK responses:

The Operator proposed a site investigation commencement date of 10/19/2021; However, no update on the progress of the site investigation has been provided in Doc #402923334 submitted on January 11, 2022. The Operator shall provide a progress update in the next subsequent form 27s.

- This site has not been assigned priority under the GRIP. The primary focus is on the priority sites that have been agreed upon under the GRIP. The Implementation Schedule has been updated to extend the timeframe in order to provide adequate time for the operator to complete these activities due to the large number of remediation sites. The primary contractor and the operator are diligently working to address the priority sites.

In accordance with Rule 914 if groundwater impacts are discovered monitoring wells are required to define the horizontal extent of impacts to groundwater. More than four wells may be required to obtain a point of compliance. The monitoring wells shall be installed within 45 days of approval of this Form 27. Additionally, COGCC requests that any monitoring wells installed be constructed as permanent monitoring wells.

- As stated in this COA, the primary contractor understands that if groundwater impacts are discovered that a sufficient number of monitoring wells will be needed to

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determine a point of compliance. At this point no groundwater impacts have been discovered and no monitoring wells are being proposed at this time. If impacts to groundwater are found Marcom will propose the installation of monitoring wells.

Operator shall provide all waste manifests that have not previously been submitted for oily waste hauled off site for disposal. Including disposal documentation for the reported 100 cubic yards of soil previously removed, as well as, documentation for the disposal of the removed standing liquids and fluids from the flowline release at surface level reported during the initial action phase (if different than the 100 cubic yards). The Operator shall submit the requested records in the next subsequent Form 27s the records in accordance with Rules 905.b.(3).

- Waste manifest documentation provided by the client has been attached to the Form 27 associated with this letter.

Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to backfill, monitoring well installation, or any sampling events performed on location and after the approval of this form.

- This COA is a reminder of the required notification set forth in the Compliance Plan Agreement (CPA). No response required.

As previously stated on Doc # 402841929: Operator will submit analytical laboratory reports, sample location map, and a table comparing results to Table 915-1 for all samples collected at this location. GPS data used to create the map must comply with COGCC Rule 216.

- As stated in this COA, all analytical laboratory reports will be provided followed by a sample location map and a summary table comparing the results with Table 915-1 limits.

As previously stated on Doc # 402841929: If field screening is to be used in conjunction with laboratory reports to define the horizontal and vertical impacts, Operator shall provide field screening readings when submitting the Form 27 Supplemental Site Investigation.

- As stated in this COA, if field screening is used to define horizontal and vertical impacts those screening readings will be provided with the submittal of a Form 27.

As previously stated on Doc # 402841929: Operator shall provide boring logs for any monitoring wells installed on location in accordance with standard environmental practices. This includes at a minimum; lithology description, USCS classifications, PID readings, sample collection depths, depth to water, and well construction.

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- As stated in this COA, the COGCC requests boring logs for any monitoring wells installed. The operator understands and will provide such documentation when monitoring wells have been installed. Currently, no monitoring wells have been installed thus the operator does not have the documentation requested.

As previously stated on Doc # 402841929: A supplemental Form 27 must be submitted within 45 days of the completion of any environmental investigation.

- The primary contractor understands the 45-day submittal requirement for the results of a completed site investigation. The Form 27 attached to this letter has updates to the site implementation schedule to accommodate the GRIP schedule and priority sites.

Should there be any questions or concerns regarding this submittal, please contact MarCom at [PrimaryContractor@marcomllc.net](mailto:PrimaryContractor@marcomllc.net).

Regards,

*McKynzie Clark*

McKynzie Clark, Environmental Scientist

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