

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403190212

Receive Date:

11/21/2022

Report taken by:

Kari Brown

Site Investigation and Remediation Workplan (Initial 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>(303) 8254822</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Ray Gorka</u>	Email: <u>rgorka@kpk.com</u>	Mobile: <u>(720) 4342215</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 26279 Initial Form 27 Document #: 403190212

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: <u>FLOWLINE SYSTEM</u>	Facility ID: <u>478831</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Facility 1</u>		Latitude: <u>40.084500</u>	Longitude: <u>-104.996660</u>
		** correct Lat/Long if needed: Latitude: <u>40.065243</u>	Longitude: <u>-104.998917</u>
QtrQtr: <u>NWNW</u>	Sec: <u>3</u>	Twp: <u>1N</u>	Range: <u>68W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

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? No

Other Potential Receptors within 1/4 mile

There are a total of 7 residence and 10 habitable structures within a quarter mile of the header and consolidation line end. County road 7 is directly adjacent to the consolidation line. Surface water is present 442' East of the header, and 489' West of the consolidation line end. The 100 year floodplain is not within a quarter mile of the header or consolidation line end. High Priority habitat is not within a quarter mile of the header or consolidation line end. There are no Bald Eagle Roost sites or Bald Eagle Active Nest site half mile buffer within a quarter mile of the header or consolidation line. There are no domestic water wells within a quarter mile of the header or consolidation line. The National Wetlands Inventory indicates that there are no wetlands within a quarter mile of the header, or consolidation line end.

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	SOILS	TBD	Sampling/Lab 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.

This form has been prepared to provide notice of the decommissioning and removal of a section Facility 1 gathering line and header associated with the UPRR 43 PAN AM I-27 and I-33 Wellhead and flowline. Approximately 1899' of the gathering line to the West from the header will be permanently removed. The remainder of the gathering line paralleling CR 7 will be left in place and active with other facilities tied in, but will eventually be abandoned under its own form 27. The off-location consolidation line system pre-removal notice was submitted under the Form 44s attached in the related forms tab. Header removal is tied with the Wellhead pre-removal notice submitted under the Form 42 attached in the related forms tab. In accordance with COGCC Rule 911.a., soil and groundwater (if present) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with COGCC Table 915-1. Visual inspection and field screening of soils around the header and associated consolidation line will be conducted during sampling activities. Soil samples will be taken and bagged every 100' along the consolidation line (see proposed soil sampling for additional info). GPS data will be collected for all soil sample locations as well as a photo log. At the other end of the consolidation line, where it will be capped, the soil under and around this connection will also be screened for compliance with COGCC Rule 911.a., soil and groundwater (if present) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with COGCC Table 915-1. Visual inspection and field screening of soils around this separator connection will be conducted during sampling activities.

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):

Grab soil samples will be collected below and/or adjacent to the header, as defined in the Rule 911.a.(4) guidance document, for field screening purposes. Along the gathering line every 100' screening will be conducted to identify impacts. Discrete Soil samples will be collected for laboratory analysis in any area observing hydrocarbon impacts, line transitions, line bends, valves, at ends of lines, and the location with the highest PID. GPS data will be collected for all soil sample and screening locations. Screening levels will indicate weather soil samples are submitted for full or Partial Table 915-1 laboratory analysis. Additionally, soil sample(s) will be collected in the area most likely to be impacted by produced water to confirm soil suitability for reclamation. The sample(s) will be submitted for laboratory analysis of COGCC Table 915.1 Inorganics constituent. Refer to the operator comments for full in depth sampling plan. Refer to the Proposed Sample Location Map.

Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260

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):

If no impacts are observed, a minimum of one soil sample from the manifold riser, and associated flowline excavations will be submitted for laboratory analysis of BTEX, naphthalene, and total petroleum hydrocarbons (TPH) - gasoline range organics (GRO: C6-C10) by United States Environmental Protection Agency (USEPA) Method 8260D, TPH - diesel range organics (DRO: C10-C28) and oil range organics (ORO: C28-C40) by USEPA Method 8015D, pH, specific conductance (EC) and sodium adsorption ratio (SAR) by saturated paste method, and boron by hot water soluble soil extract method. If impacts are encountered, a minimum of one soil sample will be submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite. If impacts are encountered, a minimum of one soil sample will be submitted for laboratory analysis of the full COGCC Table 915-1 analytical suite.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 915-1

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

Approximate areal extent (square feet) _____

NA / ND

_____ Highest concentration of TPH (mg/kg) _____

_____ Highest concentration of SAR _____

_____ BTEX > 915-1 _____

_____ Vertical Extent > 915-1 (in feet) _____

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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If a suspected release is identified and confirmed through soil screening and/or laboratory analysis, impacted soils will be removed and transported to a licensed disposal facility in accordance with Rules 905 and 906. If impacted soil accumulates 10 yards or more a form 19 will be submitted for a historical release.

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.

Potential impacts that meet the criteria in Rule 912.b. will be reported to the Director in accordance with that Rule and a site-specific soil and/or groundwater remediation plan will be developed and submitted to the COGCC via a supplemental Form 27 in accordance with Rule 913. If reportable impacts are not encountered, a supplemental Form 27 requesting closure will be submitted within 90 days following completion of sampling activities. Field screening and applicable laboratory analytical results will be reported in all submittals. E&P waste records of material transported off-site are kept on file and available upon request. Operator will submit Form 27 within 45 days of site investigation completion, detailing the findings and completion of the P&A activities.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

☐ Ex Situ

_____ 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

_____ 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.

If groundwater is encountered during P&A activities or potential remediation, groundwater samples will be collected, and a Groundwater Monitoring (GWM) Plan will be proposed to COGCC. Upon approval of the GWM plan, COGCC will be provided with a 72-hour notice before well installation.

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. 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? ☐

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:

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.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules. The site will be remediated when the surface owner is satisfied with the removal of the gathering line and manifold. KPK will consult with surface owner on requested seeding requirements.

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? _____

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

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 03/01/2023

Proposed date of completion of Reclamation. 04/28/2023

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. 02/08/2022

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/28/2022

Proposed site investigation commencement. 12/28/2022

Proposed completion of site investigation. 02/13/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/10/2023

Proposed date of completion of Remediation. 03/01/2023

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 has been prepared to provide notice of the decommissioning and removal of a section Facility 1 gathering line and header associated with the UPRR 43 PAN AM I-27 and I-33 Wellhead and flowline. The attached map shows the section of the gathering line that will be removed under this form 27 for P&A. The remaining consolidation line that parallels CR-7 will remain active in place, as it is attached to other facilities and will be removed at a later date under a separate form 27.

Grab soil samples will be collected below and/or adjacent to the header, as defined in the Rule 911.a.(4) guidance document, for field screening purposes. Along the gathering line every 100' screening will be conducted to identify impacts. Discrete Soil samples will be collected for laboratory analysis in any area observing hydrocarbon impacts, line transitions, line bends, valves, at ends of lines, and the location with the highest PID. GPS data will be collected for all soil sample and screening locations. If field screening efforts indicate no impacts present, soil samples will be analyzed for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene., total petroleum hydrocarbons (TPH) - gasoline range organics (GRO: C6-C10) by United States Environmental Protection Agency (USEPA) Method 8260D, TPH - diesel range organics (DRO: C10-C28) and oil range organics (ORO: C28-C40) by USEPA Method 8015D, pH, specific conductance (EC) and sodium adsorption ratio (SAR) by saturated paste method, and boron by hot water soluble soil extract method. If field screening efforts indicate the presence of soil impacts from organics or inorganics, soil samples will be analyzed for TPH PH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble). Proposed soil sample locations are shown on the Proposed Sample Location Map. Additionally, soil sample(s) will be collected in the area most likely to be impacted by produced water to confirm soil suitability for reclamation. The sample(s) will be submitted for laboratory analysis of COGCC Table 915.1 Inorganics constituent. Refer to the Proposed Sample Location Map.

The Flowline system (Facility # 478831) located under the site info has corrected Lat/Long of the remediation start point.

Additionally a the form 44 for the gathering line has been attached in the related forms tab.

All analytical, field screenings, updated maps, and photographs will be attached on the supplemental Form 27.

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: 11/21/2022

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: Kari Brown

Date: 12/06/2022

Remediation Project Number: 26279

COA Type

Description

	Operator shall submit field notes for all field activities on the Supplemental Form 27. If field screening is to be used in conjunction with laboratory reports then Operator shall provide field screening readings on the Supplemental Form 27.
	Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to site investigation activities.
	Operator shall adopt a quarterly reporting schedule.
	Operator states: "If a suspected release is identified and confirmed through soil screening and/or laboratory analysis, impacted soils will be removed and transported to a licensed disposal facility in accordance with Rules 905 and 906. If Impacted soil accumulates 10 yards or more a form 19 will be submitted for a historical release." Per Rule 912.b.(1).G. Operator is required to submit a Form 19i for a suspected or actual Spill or Release of any volume where the volume cannot be immediately determined. Additionally, the reporting of the discovery of 10 or more cubic yards of impacted soil is not contingent upon the analysis of samples confirming exceedance of Table 915-1 standards.
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

403190212	FORM 27-INITIAL-SUBMITTED
403191035	SITE MAP

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)