

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

404148458

Receive Date:

04/17/2025

Report taken by:

Alexander Ahmadian

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 ECMC 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: KP KAUFFMAN COMPANY INC	Operator No: 46290	Phone Numbers Phone: (720) 8689848 Mobile: (205) 9144843
Address: 1700 LINCOLN ST STE 4550		
City: DENVER State: CO Zip: 80203		
Contact Person: Cullen Chew	Email: cchew@kpk.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40353 Initial Form 27 Document #: 404148458

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: SPILL OR RELEASE	Facility ID: 484274	API #: _____	County Name: WELD
Facility Name: David Howard Flowline Release	Latitude: 40.014990	Longitude: -104.889510	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 28	Twp: 1N	Range: 6W Meridian: 6 Sensitive Area? Yes

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? Yes

Other Potential Receptors within 1/4 mile

Distances to potential receptors are as follows:

Water well: located approximately 839' northeast of the spill

Surface water: an unnamed pond is located approximately 375' north of the spill

Wetlands: a freshwater pond wetland is located approximately 537' north of the spill

Livestock: livestock pens are present approximately 935' northwest of the spill

Occupied building: a residence is located approximately 321' northwest of the spill

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	GROUNDWATER	TBD	TBD
Yes	SOILS	1545 square ft	Field screen/visual observation

INITIAL ACTION SUMMARY

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

David Howard (Landowner) notified KPK Field Supervisor of a flowline spill the evening of Thursday 4/13. KPK dispatched a field crew that confirmed the spill and isolated the flowline segment. The flowline segment is part of the Facility 7 Consolidated Flowline system and internal records indicate that the flowline consists of 6" HDPE stung inside 8" carbon steel flowline which has been field verified by excavating the release point and exposing the flowline. Approximately 526 cubic yards of soil have been excavated. Excavation of impacted soil at the spill point is on-going and was initially slowed due to weather and hydrovac activities to locate buried landowner water line in vicinity. One source and one background samples were submitted for Table 915-1 analysis. Groundwater was encountered at 10 feet bgs during excavation 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):

KPK proposes the collection of 8 sidewall soil samples from the excavation to be analyzed for Table 915-1. During the installation of 5 proposed monitoring wells, KPK will also collect 5 soil samples at the interval reporting the highest PID reading or directly above the water table from the 5 borings for Table 915-1 analysis. Additionally, once the extent of contamination has been defined, KPK proposes the collection of 8 background soil samples from 4 locations collected at depths of 5' and 10' to be analyzed for Table 915-1 inorganics. 22 discrete soil samples proposed in total. See attached figures for proposed sampling locations.

Proposed Groundwater Sampling

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

KPK proposes the installation of 5 groundwater monitoring wells surrounding and in the excavation to be analyzed for Table 915-1. Wells will be monitored on a quarterly basis until four consecutive quarters of clean groundwater laboratory results are obtained. See attached figure for proposed monitoring well locations. One of the proposed background soil sampling locations will be completed as a monitoring well to establish background inorganic groundwater levels at the site.

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

SoilNumber of soil samples collected 2Number of soil samples exceeding 915-1 2Was the areal and vertical extent of soil contamination delineated? NoApproximate areal extent (square feet) 1543**Groundwater**Number of groundwater samples collected 0Was extent of groundwater contaminated delineated? NoDepth to groundwater (below ground surface, in feet) 10Number of groundwater monitoring wells installed 0Number of groundwater samples exceeding 915-1 0**Surface Water**0 Number of surface water samples collected0 Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

NA / ND-- Highest concentration of TPH (mg/kg) 5030-- Highest concentration of SAR 3.37BTEX > 915-1 YesVertical Extent > 915-1 (in feet) 0NA Highest concentration of Benzene (µg/l) NA Highest concentration of Toluene (µg/l) NA Highest concentration of Ethylbenzene (µg/l) NA Highest concentration of Xylene (µg/l) NA Highest concentration of Methane (mg/l) **OTHER INVESTIGATION INFORMATION**☐ Were impacts to adjacent property or offsite impacts identified?☒ Were background samples collected as part of this site investigation?

One background sample was collected from the surface at the time of the release. The background sample was collected just north of the current excavation and shows organic exceedances. The Background@Surface sample results will not be considered in KPK's analysis of remaining contaminants. Additional background samples are proposed when delineation of contamination in soil is determined.

☐ 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?

Additional excavation soil sampling, background soil sampling, monitoring well installation, and groundwater sampling are proposed.

REMEDIAL ACTION PLAN**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

Source material in soil will be removed via excavation. Contaminated soil has been hauled off to a certified disposal facility. KPK will collect additional sidewall samples on the north, east, west, and south walls after further excavation. The extent of the excavation is limited to the south by CR4. KPK will install 5 monitoring wells in and around the excavation and collect samples reporting the highest field screening levels or closest to the water table from the monitoring well bore holes to determine the extent of impact in soil.

REMEDATION 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.

KPK plans to excavate remaining impacts in soil and transport the waste to a certified disposal facility. Confirmation samples will be collected to ensure that KPK is in compliance with Table 915-1. KPK will define the extent of soil impacts with soil samples collected from monitoring wells south of County Road 4. Once the impacts are delineated to the north KPK will evaluate remedial techniques to address soil impacts under the road. Groundwater will be analyzed through groundwater monitoring which will be sampled on a quarterly basis. See the attached figures for soil sample and proposed monitoring well locations. If impacts to groundwater are determined, extent will be defined and remedial technologies will be evaluated.

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) 526

Name of Licensed Disposal Facility or ECMC 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

☐ 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.

KPK proposes the installation of 5 monitoring wells surrounding (4) and within (1) the excavation to be sampled and analyzed for full Table 915-1 analytes on a quarterly basis. Please see attached map for proposed locations. The 5 monitoring wells will be surveyed to accurately determine groundwater flow direction at the site.

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 estimates that this project is 40% complete. Remaining tasks include excavation, confirmation sampling, groundwater monitoring, backfill, and reclamation. 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 ECMC 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: \$ 65000

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:

No beneficial use.

Volume of E&P Waste (solid) in cubic yards 526

E&P waste (solid) description petroleum impacted soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Front Range Landfill

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

E&P waste (liquid) description petroleum impacted groundwater

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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.

Upon completion of the backfill KPK will consult with the landowner on seeding preference. Reclamation will commence following the 1000 series reclamation 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. 09/15/2025

Proposed date of completion of Reclamation. 12/15/2025

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. 04/13/2023

Actual Spill or Release date, or date of discovery. 04/13/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/13/2023

Proposed site investigation commencement. 04/13/2023

Proposed completion of site investigation. 09/15/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/13/2023

Proposed date of completion of Remediation. 09/15/2025

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

KPK has submitted a form 44 (doc#404149935) showing the correct alignment of the flowline.

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

Signed: Cullen Chew

Title: Environmental Coordinator

Submit Date: 04/17/2025

Email: cchew@kpk.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Alexander Ahmadian

Date: 05/07/2025

Remediation Project Number: 40353

COA Type**Description**

	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (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)).
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days). ECMC selected Quarterly under Remediation Progress Update.
	Due to the presence of impacted soil in contact with groundwater (groundwater observed within the excavation) Operator shall: - Comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations. - Operator will install monitoring wells (within the spill/release area, cross-gradient, down-gradient, and up-gradient) to properly characterize groundwater pursuant to Rule 915 and determine hydraulic gradient, as required by Rule 915.e.(3)A.ii. All monitoring wells shall be constructed as permanent monitoring wells in accordance with the State Engineer's Water Well Construction and Permitting Rules - Operator will analyze groundwater samples from all monitoring wells for Table 915-1 organic and inorganic parameters for a minimum of four quarterly monitoring events.
3 COAs	

ATTACHMENT 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**

404148458	INVESTIGATION/REMEDIATION WORKPLAN (INITIAL)
404157089	MAP
404157132	PHOTO DOCUMENTATION
404157193	DISPOSAL MANIFESTS
404160298	ANALYTICAL RESULTS
404160302	ANALYTICAL DATA SUMMARY TABLE(S)
404160303	ANALYTICAL DATA SUMMARY TABLE(S)
404160306	ANALYTICAL DATA SUMMARY TABLE(S)
404193993	FORM 27-INITIAL-SUBMITTED

Total Attach: 9 Files

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

Environmental	All COAs and CAs from previously approved forms are still applicable.	05/07/2025
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Total: 1 comment(s)