

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

404139923

Receive Date:

04/07/2025

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: (303) 825-4822 Mobile: (303) 909-0875
Address: 1700 LINCOLN ST STE 4550		
City: DENVER State: CO Zip: 80203		
Contact Person: Dan Motisi	Email: dmotisi@kpk.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40345 Initial Form 27 Document #: 404139923

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: WELL	Facility ID: _____	API #: 123-09095	County Name: WELD
Facility Name: UPRR 43 PAN AM I 26	Latitude: 40.049171	Longitude: -104.953820	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 13	Twp: 1N	Range: 68W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 318445	API #: _____	County Name: WELD
Facility Name: UPRR 43 PAN AM I-61N68W 13NESW	Latitude: 40.049171	Longitude: -104.953820	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESW	Sec: 13	Twp: 1N	Range: 68W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Crop

Is domestic water well within 1/4 mile? Yes

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

The following are located within a quarter-mile of the facility:

- Three structures southwest of the facility
- Two water wells to the southwest and one well to the northeast
- Hundred year flood plain south of the facility
- Little Dry Creek and freshwater emergent is located to the south
- High priority habitat to the south

York Street borders the facility on the west side and Summit Blvd borders the facility to the 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
UNDETERMINED	SOILS	unknown	Field screening/Lab analyses

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 of the 26 UPRR Pan Am I wellhead & associated flowlines. The wellhead will be cut/capped & approximately 2,232-feet of flowline will be abandoned in place. The flowline abandonment is shown in Figure 3. Soils will be field screened adjacent to the wellhead, directional changes, at approximately 100-foot intervals along the flowline and terminating ends. See Figure 3. A minimum of five soil samples will be submitted from the wellhead, directional bend and terminating ends of the flowline for Table 915.1 analyses. In the event visual or field screening results indicate the soil is impacted along the flowline additional soil samples will be submitted for Table 915-1 analyses. Five discrete samples will be collected in each cardinal direction adjacent to the wellhead for field screening & one sample beneath the wellhead will be screened & submitted for Table 915-1 analysis. Soil sampling details for the wellhead & flowline are summarized in the attached Figure 4. In the event soil impacts are encountered, additional soil samples will be collected and submitted for Table 915.1 analyses to determine the extent of impacts. In accordance with ECOM Rule 911.a., if groundwater is encountered, samples will be collected at and submitted for laboratory analysis to determine if concentrations are in compliance with ECOM Table 915-1. GPS data will be collected for all sample locations as well as a photo log. Sampling data and photos will be submitted via a Form 27 Supplemental.

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):

A minimum of 5 soil samples will be collected at the wellhead, directional changes and terminating end of the flowline. The flowline will be field screened every 100 feet and samples will be collected at the terminating end of the flowline for Table 915.1 analysis. If soil impacts are observed along the flowline based on visual and field screening observations additional soil samples will be collected and submitted for the full Table 915-1 analyses. See attached Sample Location Map. Field screening and laboratory data, sample location coordinates and photo logs will be provided in a Form 27 Supplemental.

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 activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4 trimethylbenzene (1,2,4-TMB), and 1,3,5-trimethylbenzene (1,3,5-TMB), using ECOM-approved methods appropriate for detecting contaminants of concern in ECOM Table 915-1.

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 _____ 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 Initial 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.

If reportable impacts to soil or groundwater are encountered, as defined in Rule 912.b., a site-specific remediation plan will be developed and submitted to the ECMC via Form 27. If reportable impacts are not encountered, a supplemental Form 27 will be submitted requesting closure within 90 days following completion of sampling/assessment activities.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

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

If Yes: Estimated Volume (Cubic Yards) _____

Name of Licensed Disposal Facility or ECMC 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.

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 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: \$ 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

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&P waste (liquid) description

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.

The site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules. The surface owner will also be consulted on reclamation and seed mix.

Is the described reclamation complete? _____

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. 06/02/2025

Proposed date of completion of Reclamation. 06/27/2025

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. 03/14/2025

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/30/2025

Proposed site investigation commencement. _____

Proposed completion of site investigation. 05/30/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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

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

Signed: Dan Motisi

Title: Environmental Geologist

Submit Date: 04/07/2025

Email: dmotisi@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: 40345

COA Type**Description**

	Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2). for Flowline abandonment. Should a portion of the flowline be abandoned in place due to field constraints the Operator shall collect soil samples at the start and end point of the abandoned portion and confirm the presence or absence of impacts adjacent to the abandoned flowline section. These samples can be collected via hand auger to minimize surface disturbance.
	Location is adjacent to a proposed High Priority Habitat. Please note that Approval of this Form 27 does not supersede any Federal, State or Local regulations. If the remediation encroaches into the HPH area, ECMC recommends consultation with Colorado Parks and Wildlife.
	Location is adjacent to a jurisdictional Wetlands as mapped on the National Wetland Inventory Maps. In the event that operations encroach upon the wetlands, Operator shall consult with the US Army Corps of Engineers regarding compliance with Sections 401 and 404 of the Clean Water Act. Operator shall submit all communications/permits obtained to the ECMC via Form 4 Sundry. Note: Approval of this Form 27 does not supersede any Federal, State or Local regulations.
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days). ECMC selected Quarterly under Remediation Progress Update.
	If groundwater is encountered, inorganic parameters (TDS, chloride, sulfate) will be sampled in addition to the organics proposed under the Site Investigation Plan.
	Operator shall include the Flowline Facility ID under the Site Information tab on the next Form 27 Supplemental.

6 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**

404139923	FORM 27-INITIAL-SUBMITTED
404143608	MAP

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)