

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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402824813
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09/28/2021

Report taken by:
PETER GINTAUTAS

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 Phone: <u>(303) 8254822</u> Mobile: <u>()</u>
Address: <u>1675 BROADWAY, STE 2800</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jeff Rickard</u>	Email: <u>jrickard@kpk.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 20310 Initial Form 27 Document #: 402824813

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 Multiple Facilities

Facility Type: SPILL OR RELEASE Facility ID: 480251 API #: _____ County Name: WELD

Facility Name: UPRR 42 PAN AM AE #2 Latitude: 40.092035 Longitude: -104.924641

** correct Lat/Long if needed: Latitude: _____ Longitude: _____

QtrQtr: NESE Sec: 31 Twp: 2N Range: 67W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Residential

Is domestic water well within 1/4 mile? _____ Is surface water within 1/4 mile? _____

Is groundwater less than 20 feet below ground surface? _____

Other Potential Receptors within 1/4 mile

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
	SOILS	TBD	TBD

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 leak occurred at surface when a gasket seal on a riser had a leak. The leak has been repaired and all soil on the surface that was visually impacted (approx. top 1 ft) of soil was removed.

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 to take a minimum of five discrete samples, one on each wall and one on the floor.

Proposed Groundwater Sampling

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

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

NA / ND

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 Highest concentration of TPH (mg/kg) _____
 NA 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.

 Dig and removal at approved facility.

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.

 Soil will be removed until PID screening indicates all impacted soil has been removed. Once soil screening indicates removal of all impacted soil, discrete samples will be taken to confirm.

Soil Remediation Summary

- | | |
|---|---|
| <input type="checkbox"/> In Situ | <input type="checkbox"/> Ex Situ |
| _____ Bioremediation (or enhanced bioremediation) | _____ Excavate and offsite disposal |
| _____ Chemical oxidation | _____ If Yes: Estimated Volume (Cubic Yards) <u>50</u> |
| _____ Air sparge / Soil vapor extraction | _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ |
| _____ Natural Attenuation | _____ Excavate and onsite remediation |

Other _____

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.

Empty text box for monitoring plan description.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Empty text box for additional schedule details.

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Empty text box for alternative schedule details.

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? _____

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

NA

Volume of E&P Waste (solid) in cubic yards _____ 50

E&P waste (solid) description Soil _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Connections Erie _____

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

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.

Location will be reclaimed to COGCC rules.

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? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/01/2022

Proposed date of completion of Reclamation. 10/01/2022

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. 07/03/2021

Actual Spill or Release date, or date of discovery. 07/03/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/01/2021

Proposed site investigation commencement. 11/01/2021

Proposed completion of site investigation. 11/12/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/01/2022

Proposed date of completion of Remediation. 10/01/2022

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 is being submitted to close Spill ID#480251 with a remediation #.

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

Signed: ` Jeff Rickard _____

Title: Regulatory _____

Submit Date: ` 09/28/2021 _____

Email: jrickard@kpk.com _____

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: PETER GINTAUTAS _____

Date: 10/06/2021 _____

Remediation Project Number: 20310 _____

Condition of Approval**COA Type****Description**

	Groundwater is shallow at the site and no investigation of likely impacts to groundwater is proposed. A revised site investigation plan must be submitted within 10 days (16October2021) which includes how the operator will determine if shallow groundwater has been impacted by the spill.
	The Operator states that all visibly impacted soils have been removed from the site to an approximate depth of 1 foot. Provide documentation of removal activities in a a supplemental form 19 to meet the requirements of rule 905.b.(3).
	Proposed implementations schedule suggesting site investigation will not commence until approximately 4 months following spill discovery and that remediation will not commence until 8 months following spill discovery is not compliant with rule 912.a.(1) and 912.a.(2) and a revised implementation schedule with respect to site investigation and remediation activities must be submitted within 10 days (16October2021).
3 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**

402824813	FORM 27-INITIAL-SUBMITTED
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)