

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

03/02/2018

Submitted Date:

03/21/2018

Document Number:

681700992**FIELD INSPECTION FORM**Loc ID 450344 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: K P KAUFFMAN COMPANY INCAddress: 1675 BROADWAY, STE 2800City: DENVER State: CO Zip: 80202**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:23 Number of Comments20 Number of Corrective Actions

- ☒ Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
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Young, Rob		rob.young@state.co.us	
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LARA-MESA, SUSANA	(303) 825-4822	slaramesa@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
102701	PIT	AC			-	BOXER LEASE Production Pit	EI
102703	PIT	AC			-	BOXER LEASE WEST SKIM PIT	EI
439100	TANK BATTERY	AC	09/26/2014		-	Boxer 25,26,29 Battery	EI

General Comment:

COGCC Environmental field inspection of KPK Boxer 25, 29, &26 Tank Battery facility. Follow-up to Remediation Projects #9362 and #1551.

LocationOverall Good: ☐

Signs/Marker:			
Type	BATTERY		
Comment:	Adequate		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Adequate		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	NOT IN USE: Unmarked, 2" pipe riser daylights south of produced water AST. See photos.		
Corrective Action:	Contact the Engineering Integrity department to discuss flowline testing requirements per Rule 1102. Refer to the 1101 and 1102 guidance document for further details.	Date:	04/02/2018
Type	UNUSED EQUIPMENT		
Comment:	Flowline manifold daylighting at NE corner of crude oil AST berm includes 2" riser and 1" valve. Flowline risers on west side of crude oil ASTs. Valves at NW corner of crude oil AST berms. See photos.		
Corrective Action:	Contact the Engineering Integrity department to discuss flowline testing requirements per Rule 1102. Refer to the 1101 and 1102 guidance document for further details.	Date:	04/02/2018
Type	UNUSED EQUIPMENT		
Comment:	Approximately 10'x10' unused concrete foundation located east of VHT shed. See photos.		
Corrective Action:	Comply with Rule 603.f . (concrete foundation)	Date:	06/21/2018
Type	WEEDS		
Comment:	Uncontrolled weeds at production pit. See photos.		
Corrective Action:	Comply with Rule 603.f (weeds)	Date:	04/02/2018
Type	UNUSED EQUIPMENT		
Comment:	NOT IN USE: 2" pipe riser located north of concrete pad on north side of facility. Flowline manifold on west side of concrete pad has unmarked 2" riser. See photos.		
Corrective Action:	Contact the Engineering Integrity department to discuss flowline testing requirements per Rule 1102. Refer to the 1101 and 1102 guidance document for further details.	Date:	04/02/2018

Overall Good: ☐

Spills:			
Type	Area	Volume	
Crude Oil	Tank	<= 1 bbl	
Comment:	Localized accumulations of oily waste underlying valves on west side of crude oil ASTs. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (west of crude oil ASTs)		Date: 04/21/2018
Crude Oil	Tank	<= 1 bbl	
Comment:	Localized accumulation of oily waste surrounding inner perimeter of earthen berm at produced water AST. See photos.		

Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (produced water AST).			Date:	04/21/2018
Crude Oil	Tank	<= 1 bbl			
Comment:	Oil-stained soil incorporated into SE corner of crude oil AST berm. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (berms)			Date:	04/21/2018
Crude Oil	Separator	<= 1 bbl			
Comment:	Localized accumulations of oily waste inside of separator shed. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (separator shed)			Date:	04/21/2018

In Containment: No

Comment: Multiple occurrences of localized, oil-stained soil throughout battery location outside of containment. See photos.

☒ Multiple Spills and Releases?

Equipment:			corrective date
Type: Flow Line	# 1		
Comment:	Flowline exposed inside of natural drainage just outside of fenceline, approximately 75' south of produced water AST. See attached photos #27-29.		
Corrective Action:	Contact the Engineering Integrity department to discuss flowline maintenance and operation requirements per Rule 1102. Refer to the 1101 and 1102 guidance document for further details.		
			Date: 04/02/2018
Type: Vertical Separator	# 1		
Comment:	Localized accumulations of oily waste inside of separator shed. See photos.		
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. (separator shed)		
			Date: 04/21/2018

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	300 BBLS	STEEL AST		
Comment:					
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Inadequate	Walls Insufficient		Inadequate	
Comment:	Earthen berm shallow, eroded, damaged, and burrowed. See photos.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4). (produced water AST)				Date: 04/21/2018
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	300 BBLS	STEEL AST		,
Comment:	Localized accumulations of oily waste underlying valves on west side of crude oil ASTs. See photos.				

Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. (crude oil ASTs)	Date:	04/21/2018
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Paint

Condition		
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Insufficient		Inadequate
Comment:	Earthen berms damaged, eroded, and burrowed. See photos.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4). (crude oil ASTs)			Date: 04/21/2018

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities								
Facility ID:	102701	Type:	PIT	API Number: -	Status:	AC	Insp. Status:	EI
Facility ID:	102703	Type:	PIT	API Number: -	Status:	AC	Insp. Status:	EI
Facility ID:	439100	Type:	TANK	API Number: -	Status:	AC	Insp. Status:	EI

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Land Treatment	Inadequate		
Comment:	Remediation Project #1551 documents land treatment of oily waste at facility and remains open. To date, operator has not provided COGCC with information regarding disposition of oily waste under Remediation Project #1551. Operator has not provided any supplemental information or project reports since the workplan was approved.			
Corrective Action:	Provide project status update and documentation of work performed under Remediation Project #1551 to COGCC via Supplemental eForm 27.			Date: 04/21/2018

Spill/Remediation:

Comment:	Operator's proposed workplan to sample salt kill areas extending ~500' S and SW of produced water pit was approved under Remediation Workplan #9362 in November of 2015. Operator has not provided any supplemental information or project reports since the workplan was approved.			
Corrective Action:	Provide project status update and documentation of work performed under Remediation Project #9362 to COGCC via Supplemental eForm 27. Project update shall include revised workplan to stop erosion and off-site sediment transport in addition to plans to restabilize (regrade/revegetate) the subject facility.			Date: 04/21/2018

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Evidence of erosion and off-site sediment transport as well as absence of adequate stormwater controls observed throughout facility. See photos. Offsite impacts from lack of stormwater control are subject of Remediation Project #9362.

Corrective Action: Immediately install or repair required BMPs per Rule 1002.f. See Spill/Remediation section for additional corrective actions.

Date: 04/02/2018

Pits: ☐ NO SURFACE INDICATION OF PIT

Type: Produced Water Lined: NO Pit ID: 102701 Lat: 40.102312 Long: -103.891915
 Reference Point: SE Other: _____ Length: 200 Width: 90

Lining:

Liner Type: _____ Liner Condition: _____

Comment: _____

Corrective Action _____

Date: c

Fencing:

Fencing Type: None Fencing Condition: _____

Comment: _____

Corrective Action _____

Date: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: Earthen berms eroded and overgrown. See photos.

Corrective Action: Repair berms to prevent release of produced water and to protect the environment from significant adverse impact, per Rule 902.a.

Date: 04/21/2018

Anchor Trench Present: NO Oil Accumulation: NO 2+ feet Freeboard: YES

Comment: No freeboard-monitoring method is being employed at produced water pit.

Corrective Action: Install method of monitoring and maintaining freeboard, per Rule 902.b.

Date: 05/21/2018

Type: Skimming/Settling Lined: NO Pit ID: 102703 Lat: 40.102504 Long: -103.891893

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: _____ Liner Condition: _____

Comment: _____

Corrective Action _____

Date: c

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Corrective Action _____

Date: _____

Netting:

Netting Type:		Netting Condition:	
Comment:			
Corrective Action			
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:	
Comment:	Form 27 attachments under Remediation Project #1551 (doc #2089904-attached) and historical aerial photographs document presence of netted skim pit (Facility ID #102703) at NE corner of current produced water pit. Operator's use of skim pit on location is also documented in 8/5/2008 Field Inspection Report (doc #200194330) and in NOAV #200130007.		
Corrective Action	Provide pit closure, remediation, and reclamation documentation via eForm 27.		
			Date: <u>04/21/2018</u>

Attached Documents

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
681700993	Remediation Project 1551	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4409856
681700994	Remediation Project 9362	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4409857
681700995	doc 2086963_Aproved Soil Sampling Locations	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4409858
681701012	Field Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4409859