

**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:

09/04/2019

Submitted Date:

09/04/2019

Document Number:

697500565

FIELD INSPECTION FORM
 Loc ID 332971 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num:
Operator Information:

OGCC Operator Number: 46290

Name of Operator: KP KAUFFMAN COMPANY INC

Address: 1675 BROADWAY, STE 2800

City: DENVER State: CO Zip: 80202

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

7 Number of Comments

4 Number of Corrective Actions

☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Silver, Randy		randy.silver@state.co.us	
Pesicka, Conor		conor.pesicka@state.co.us	
Gomez, Jason		jason.gomez@state.co.us	
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
332971	LOCATION	AC			-	HLADKY-O'GORMAN-62N66W 21NWSW	RI

General Comment:

This inspection is in response to a complaint- see complaint section for more details. This is a joint inspection with both Reclamation and Field Inspection staff. Field Inspection staff, Randy Silver, will submit a separate inspection.

After an internal review of recent inspections at KPK facilities, COGCC Staff has determined that KPK has repeatedly and consistently failed to comply with certain COGCC rules (categorized in those inspection reports as violations related to "Signs/Marker," "Emergency Contact Number," and/or "Good Housekeeping"). In light of this apparent pattern of violations, violation(s) identified in this inspection report under those categories are being entered for notification and documentation only and are not intended to provide KPK the potential opportunity to resolve the alleged violation(s) without the imposition of penalty, pursuant to Rule 522.c. Therefore, in this inspection report, COGCC Staff has documented violation(s) and identified relevant corrective action(s) required to return to compliance, and pursuant to Rule 522.c., retains discretion to seek penalties for any violation documented in this inspection report.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	UNUSED EQUIPMENT		
Comment:	Operator has failed to remove unused equipment from the well location. Refer to Photo #3 of the attached inspection photo document.		
Corrective Action:	Comply with Rule 603.f. This is being referred to Enforcement; therefore, there is no corrective action date.		Date:

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected FacilitiesFacility ID: 332971 Type: LOCATION API Number: - Status: AC Insp. Status: RI**Complaint**

Comment: [Complaint #: 200448045](#)
[Field Inspector Assigned: Chris Binschus and Randy Silver \(joint inspection\)](#)
[Location ID #: 332971](#)
[Inspection Document #: 697500565](#)
Nature of complaint: An inspection of the above location was conducted with focus on Interim Reclamation. Complainant indicated the Operator failed to control weeds and maintain fencing to keep cattle out of the oil and gas location.

[Randy Silver will conduct an inspection regarding the leaking well complaint.](#)

Corrective Action:

Date:

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____ Fail _____

Comment Operator has failed to maintain perimeter fencing around the well location and equipment to prevent livestock entry. This is a reoccurring issue dating back in 2016. Refer to Photos #2, 5-6 of the attached inspection photo document.

Corrective Action Comply with Rule 1002.a.(3). Operator shall collaborate with the surface owner to ensure compliance with Rule 1002.a.(3). This is being referred to Enforcement; therefore, there is no corrective action date.

Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

- 1003b. Area no longer in use? _____ Production areas stabilized ? _____
- 1003c. Compacted areas have been cross ripped? _____
- 1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
- Cuttings management: _____
- 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
- Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____ F _____

Comment Operator has failed to prevent the invasion of undesirable weed species (Kochia) throughout the well location on cropland. Refer to Photos #3-6 of the attached inspection photo document.

Corrective Action Comply with Rule Rule 1003.e.(1). This is being referred to Enforcement; therefore, there is no corrective action date.

Date _____

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment:

Corrective Action:

Date _____

Overall Final Reclamation ☐ Well Release on Active Location ☐ Multi-Well Location ☐

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: Operator has failed to maintain vehicle control practices (cattle guard) which is also failing to keep cattle out of the well location. Refer to Photo #1 of the attached inspection photo document.</p> <p>Corrective Action: Comply with Rule 1002.f.(2)F. This is being referred to Enforcement; therefore, there is no corrective action date.</p> <p>Date: _____</p>						
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

COGCC Comments

Comment	User	Date
<p>COGCC Inspection Report Summary:</p> <p>On Wednesday 09/4/2019 at approximately 10:45 hrs. I, Chris Binschus, conducted an on-site inspection at:</p> <p>Operator Name: KP KAUFFMAN COMPANY INC</p> <p>Location Name: HLADKY-O'GORMAN</p> <p>Location ID: 332971</p> <p>Location County: Weld County, Colorado</p> <p>While there, I observed the following violations:</p> <p>1) Rule 603.f.: Operator has failed to remove unused equipment from the well location.</p> <p>2) Rule 1002.a.(3): Operator has failed to maintain perimeter fencing around the well location and equipment to prevent livestock entry. This is a reoccurring issue dating back in 2016.</p> <p>3) Rule 1002.f.(2)F: Operator has failed to maintain vehicle control practices (cattle guard) which is also failing to keep cattle out of the well location.</p> <p>4) Rule 1003.e.(1): Operator has failed to prevent the invasion of undesirable weed species (Kochia) throughout the well location on cropland.</p> <p>Operator will have to coordinate with the surface owner to remove surface owner equipment from the well location to perform weed maintenance and fence repairs.</p> <p>End of summary inspection report.</p>	binschusc	09/04/2019

Attached Documents

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

Document Num	Description	URL
697500566	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4928611