

**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:

07/21/2020

Submitted Date:

08/10/2020

Document Number:

697601052**FIELD INSPECTION FORM**Loc ID 477261 Inspector Name: GINTAUTAS, PETER On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP 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:**4 Number of Comments1 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
Inspections, KPK		cogcc@kpk.com	<a href="#">All KPK Inspections</a>
,		rwatzman@kpk.com	<a href="#">All Inspections</a>
Knop, Max	303-825-4822	MKnop@kpk.com	
Axelson, John		john.axelson@state.co.us	

**General Comment:**

Anonymous complaint 200449051 received 06/25/2020 alleging dumping of E&P wastes in field to north of Kauffman field offices at 8979 Weld County Road 22, Fort Lupton, CO 80621 (listed as Weld County Parcel 131109400071) COGCC non-facility 477263 and COGCC location 477261 created for documentation of investigation as no Kauffman operated oil and gas facility related to E&P waste disposal exists at the site. Complainant alleged that they believed soils brought to site contained hydrocarbons based on olfactory observations (odor) at a distance. COGCC staff also noted hydrocarbons odors emanating from some soils spread on the locations and noted hydrocarbon staining on some soils at the location as pointed out to staff of the operator who was present during the sampling event on 06/30/2020.

11 soil samples collected for laboratory analysis collected on previous inspection day as described in document 697601045. Two of the samples are background samples from off the spreadfield and are of the native soil (Vona loamy sand) at the site and under the spreadfield. Attached maps indicate laboratory reported concentrations of several analytes listed in COGCC table 910-1. Chromatograms of the TEPH analysis show that unrefined hydrocarbons (crude oil) are present in the nine composite samples of spreadfield material but not in the background soils. EC is elevated in each of the nine spreadfield samples compared to the background samples and greater than threshold in Table 910-1 in eight of the nine spreadfield samples. SAR is also elevated in each of the nine spreadfield samples in comparison to the background samples. The reported concentrations of arsenic (As) in the nine spreadfield samples is in excess of the threshold concentration in COGCC Table 910-1 and much greater than the concentrations of As reported in the background samples.

The analytical data can be accessed on the COGCC webpages and the environmental sample database related to sample facility 766065 with PDF of lab results available under the docs tab for the sample facility.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume			

In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Environmental****Spills/Releases:**Type of Spill: OTHER E&P WASTE

Estimated Spill Volume: \_\_\_\_\_

Comment: actions required as COA from previous inspection were completed as of 08/07/2020. Operator indicated that materials were from an excavation related to a spill and remediation project as documented in FIR resolution document 40246220. The soils were brought by truck to this location from the site of spill 468756 (Remediation Project 14962) about 5 miles to the southeast of the spreadfield. Analyses of samples collected at the spreadfield indicate that the materials are exploration and production wastes impacted by crude oil and produced water. All samples from the spreadfield contained crude oil which indicates the soils brought to the site are oily E&P waste. All samples from the spreadfield had elevated EC and SAR indicative that the soils brought to the site were impacted by produced water as well as by crude oil nor is the site a properly permitted commercial solid waste disposal facility. The operator did not obtain COGCC approval of a centralized E&P waste facility at the location which is one of three possible mechanisms of disposal of oily waste solids required by rule 907.e. Materials as the site constitute an unauthorized discharge and disposal of E&P waste.

Corrective Action: spill of E&P waste must be reported as such with appropriate notifications to other agencies as required in Rule 906 with verbal reports due by corrective action date listed. The spill is one that threatens to impact surface waters due to the proximity of the spreadfield to USFWS mapped wetlands and a freshwater pond. As part of the spill response a site investigation and remediation plan must be submitted and approved documenting how E&P wastes at the site are to be contained temporarily until the wastes are removed from the site. The plan must also document how the operator will determine if shallow groundwater in the area is impacted and also determine if impacts are present in the nearby wetlands and surface water body.

Date: 08/11/2020Reportable: YES

GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_

Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

Lat \_\_\_\_\_ Long \_\_\_\_\_

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

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

Document Num	Description	URL
697601053	TEPH results plotted on 2019 aerial image	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220234">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220234</a>
697601054	EC results plotted on 2019 aerial image	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220235">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220235</a>
697601055	arsenic results plotted on 2019 aerial image	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220236">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220236</a>
697601056	SAR results plotted on 2019 aerial image	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220237">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220237</a>
697601057	spreadfield outline and associated features	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220238">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220238</a>
697601058	sample locations on 2019 aerial image	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220239">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220239</a>
697601059	Photos of spreadfield	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220240">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220240</a>
697601060	Index of attached photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220241">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5220241</a>