

**FORM
INSP**Rev
X/20

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:

04/01/2021

Submitted Date:

04/02/2021

Document Number:

689501171

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Brown, Kari 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

5 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
Axelson, John		john.axelson@state.co.us	
,		mknop@kpk.com	
Canfield, Chris		chris.canfield@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Deranleau, Greg		greg.deranleau@state.co.us	
, KPK		cogcc@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	

General Comment:

This is an environmental inspection. Any corrective actions from previous inspections that have not been addressed are still applicable. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

On April 1, 2021 Nikki Graber and Kari Brown conducted a subsequent inspection of Remediation #15743 (Spill #476918 Robert G Berge #2). This inspection documents updates to the remediation since COGCC inspection on 3/29/2021 (Document #691201427).

New Brantner Irrigation Ditch Damage: Work has been initiated on the ditch wall. Additional sections of the wall have been removed (Photos 1, 2, 4) and portions of the ditch floor have been scraped (Photos 3, 4). COGCC met with the New Brantner Ditch Rider and he stated that the floor disturbance was not a problem as long as work didn't go any deeper.

Impacted Soil Stockpiled on Location: Approximately 50 cubic yards of stockpiled impacted soils (E&P Waste) remain on location (Photos 11, 13). BMP's are present around the stockpile however, as noted on previous inspection reports the BMP's are inadequate to control runoff from the stockpile, violating Rule 913.b.(5)B.iv (Photos 11-15). A second smaller stockpile which is assumed to be overburden had been pushed into the excavation since previous inspections (Photos 5-7). COGCC will require a composite sample from the stockpile to confirm compliance with Table 915-1. Trash was observed in the backfill (Photo 8).

Open Excavation: Backfilling of excavation has been initiated and additional clean soil has been hauled to the location (Photos 5, 6). Groundwater with a hydrocarbon sheen was present and the flowline was flowing at the time of inspection (Photos 9, 10). There was no equipment on location. No analytical data or supplemental Form 27 has been provided by the Operator to demonstrate the location is compliant with Table 915-1. Operator last submitted a Form 27 for this project 12/4/2020 (Doc #402546972) to provide the results of a soil boring investigation conducted 9/29/2020.

Fencing: No fencing was present during this inspection, violating Rule 913.b.(5)B.i.

Disturbance: Operator failed to minimize surface damage as required by Rule 913.b.(5)B.iii; there was significant damage to adjacent crops. Vehicle tracks had gone an additional ~150' into the field to the west (Photos 15 and 16)

Corrective actions identified that require immediate response from operator

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	TRASH		
Comment:	Trash was observed in the backfill of the open excavation (Photo 8).		
Corrective Action:	Remove trash from excavation before continuing backfill.		Date: <u>04/01/2021</u>
Type	OTHER		
Comment:	Vehicle tracks had gone an additional ~150' into the field to the west (Photos 15 and 16) creating large ruts in the field and damaging crops. Operator is out of compliance with Rule 913.b.(5)B.iii.		
Corrective Action:	As per Rule 913.b.(5)B.iii, when conducting Remediation activities Operators will minimize surface disturbance. Operator will coordinate with the surface owner to reclaim location.		Date: <u>05/01/2021</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type	OTHER		
Comment:	No fencing present around open excavation (photo 2).		
Corrective Action:	Secure access to excavation in compliance with Rule 913.b.(5).B.i and COGCC Guidance 913.b.(5)B i-v.		Date: <u>04/01/2021</u>

Venting:

Yes/No			
Comment:			
Corrective Action:			Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: At the time of inspection the excavation was open and work had been initiated on the ditch wall. Additional sections of the wall have been removed (Photos 1, 2, 4) and portions of the ditch floor have been scraped (Photos 3, 4). Backfilling of excavation has been initiated and additional clean soil has been hauled to the location (Photos 5, 6). A hydrocarbon sheen was observed on groundwater at the bottom of excavation (Photos 9, 10).

Corrective Action: Operator will continue to backfill the open excavation with clean dirt and rebuild the ditch sidewall to the irrigation company's standards to restore the integrity of the irrigation ditch wall. Documentation that ditch repair was made to the specifications and satisfaction of the ditch company must be submitted via supplemental Form 27. Prior to backfill Operator will submit soil and groundwater samples collected from the open excavation to verify that the vertical and lateral extent of impacts has been defined and that the spill location is compliant with Table 915-1. Analytical results will be submitted via Supplemental Form 27 and will include all analytical laboratory reports and a site map documenting sample locations.

Date: 03/24/2021

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type Management Condition GPS (Lat) (Long)

Oily Soil	Piles	Inadequate		
Comment	Oily soils stockpiled on location; no signage present and BMP's inadequate to control runoff (Photos 11-14). One soils stockpile previously stored on location (assumed to be overburden) appears to have been pushed back into the open excavation and used as backfill (Photos 5-7).			
Corrective Action	Immediately remove impacted material from location. Submit waste disposal manifests and gate tickets for impacted material via Supplemental Form 27. Submit a composite sample from the stockpile used as backfill to confirm compliance with Table 915-1 via Supplemental Form 27.			Date: 03/04/2021

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

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

Document Num	Description	URL
402647234	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5393232
689501172	Field Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5393192