

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: <u>06/24/2021</u> Submitted Date: <u>06/25/2021</u> Document Number: <u>697601390</u>
FIELD INSPECTION FORM			

Loc ID _____ Inspector Name: GINTAUTAS, PETER On-Site Inspection
 2A Doc Num: _____

Status Summary:

THIS IS A FOLLOW UP INSPECTION
 FOLLOW UP INSPECTION REQUIRED
 NO FOLLOW UP INSPECTION REQUIRED

Findings:

4 Number of Comments
 2 Number of Corrective Actions
 Corrective Action Response Requested

Operator Information:

OGCC Operator Number: 46290
 Name of Operator: KP KAUFFMAN COMPANY INC
 Address: 1675 BROADWAY, STE 2800
 City: DENVER State: CO Zip: 80202

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
Knop, Max	303-825-4822	MKnop@kpk.com	
Inspections, KPK		cogcc@kpk.com	All KPK Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
470915	SPILL OR RELEASE	CL	04/10/2020		-	NESSSU Consolidated Line	EI
476987	SPILL OR RELEASE	AC	07/02/2020		-	NESSSU CONSOLIDATION	EI

General Comment:

Environmental inspection of site of two flowline related spills. Spill 476987 at site remains open as corrective actions required by flowline integrity inspector (doc 690102005 and doc 690101949) have not been adequately completed or addressed. COA for closure of spill 476987 required closure within 45 days of spill with closure required by 2 August 2020. Spill remains open as adequate documentation for closure has not been provided by operator.

Site had open excavation and ineffective and inadequate means of excluding entry of people, livestock or wildlife at time of inspection. Operator had removed adequate fencing steel panel and not repaired other fencing at site as shown in attached photos. Excavation in attached photos is part of site investigation and remediation project 15797 which remains open at this time. Operator reported in form 27 that repairs to flowline had been made but that no flowline integrity test had been completed. See Document 402649642 and operator also stated that full lateral and vertical extent of impacts had not been determined as of 6 April 2021. Corrective actions from past inspection remain open unless documented by FIRR.

Farmer operating in this field reported that he used Fulton ditch waters of the state to irrigate crop field a few days prior to inspection as he reported that is the water source he has used at that field for as long as he has farmed the field.

Farmer also reported that he had contacted Operator prior to flood irrigating the field in effort to prevent or lessen migration of impacts remaining at spill site. He also reported that the excavation had been full of irrigation water as operator had not provided any diversion structures to keep irrigation waters out of excavation.

At time of inspection water had infiltrated through presumably impacted soils in excavation with likely migration of contaminants of concern to groundwater and or spread further in farm soils around excavation. Soils remaining at site are assumed to be impacted as operator has to this date provided no data showing that impacts have been removed for site of spills. And at this time Operator has not shown that they have determined the full lateral and vertical extent of impacts at the site.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

WEEDS

Comment:

weeds have developed in area around excavation as farmer cannot utilize tilling or other mechanical means of weed control in disturbed area used by Operator. weeds are present as shown in attached photo in an active crop field.

Corrective Action:

Comply with Rule 606 in cooperation with farmer

Date: 07/02/2021

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:

Inspected Facilities

Facility ID: 470915 Type: SPILL OR API Number: - Status: CL Insp. Status: EI

Facility ID: 476987 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Environmental

Spill/Remediation:

Comment: impacted soils remain at site, report by farmer and visual observation during this inspection indicate that Rule 913.b(5)B.iv is not being followed

Corrective Action: Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water (irrigation water) and stormwater around spill site in manner that prevents impacts to those matrices.

Date: 07/25/2021

Emission Control Burner (ECB): _____

Comment: _____

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

Attached Documents

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

Document Num	Description	URL
697601391	inadequate fencing and stormwater controls and uncontrolled weeds in excavation area	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5464918
697601392	following flood irrigation - mud remaining after infiltration of waters of the state	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5464919
697601393	following flood irrigation - mud in excavation after infiltration of waters of the state	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5464920