

**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:

08/05/2021

Submitted Date:

08/06/2021

Document Number:

697601477

FIELD INSPECTION FORMLoc ID 332886 Inspector Name: GINTAUTAS, PETER 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:

5 Number of Comments

1 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
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
464277	SPILL OR RELEASE	CL	05/15/2020		-	Parker #44-15	EI

General Comment:[environmental inspection of spill 464277 and remediation project 13908 progress](#)

Environmental**Spill/Remediation:**

Comment: operator has not been able to document removal of E&P wastes from site as required by rule 905 and subsections.

Corrective Action: submit supplemental form 27 with documentation of volumes of E&P wastes removed from spill excavation and as best possible records of transport and where transport brought waste

Date: 10/05/2021

Emission Control Burner (ECB):

Comment:

Pilot: Wildlife Protection Devices (fired vessels):

COGCC Comments

Comment	User	Date
Operator has not been able to document compliance with Rule 905.b. (including subsections describes how E&P Waste Transportation processes and also the tracking required by operators. Per rule 905.b.(3) the operator must record and document transportation offsite of E&P wastes. Waste Generator Requirements. Any Operator that generates E&P Waste that is transported off-site will maintain, for not less than 5 years, copies of each invoice, bill, or ticket, and such other records as necessary to document the requirements listed in Rules 905.b.(3).A–F. Such records will be signed by the transporter and provided to the Director upon request. A. The date of the transport; B. The identity of the waste generator; C. The identity of the waste transporter; D. The location of the waste pickup site; E. The type and volume of waste; and F. The name and location of the treatment or disposal site.	gintautp	08/06/2021
Remediation project 13908 – COGCC Suggestions for Operator - July 8, 2021 We are providing questions/suggestions to you as to how to possibly approach reconciling the available trucking records with actual volumes of E&P wastes removed. The documentation and records of work done will be used by you and COGCC in attempting to determine a best estimate of the volume of E&P waste generated and removed from the site. We will use the information Operator provides to evaluate any request for closure of the site investigation and remediation plan. There may be other questions we will ask as the review goes on. You may have suggestions that would help the process so please contact COGCC with suggestions concerns or questions. The final product of chronology and associated documentation will need to be attached to a supplemental form 27 so it can be part of the record for this remediation project. Please compile and submit a chronology of the activities conducted by Operator as part of the site investigation/remediation effort from August 6, 2020 to and including the date(s) upon which the excavation was backfilled. As per Rule 915.e(1)A. "Field Analysis. Field measurements and field tests will be conducted using appropriate equipment, calibrated and operated according to manufacturer specifications, by personnel trained and familiar with the equipment. Operators will provide all field measurements and tests to the Director upon request, including but not limited to field	gintautp	08/06/2021

notes, field screening logs, soil boring logs, monitor well construction Logs, pump test reports, photographs, and soil vapor screening results.” As part of the chronology please attach any field notes, field screening logs, photographs of the excavation and field tests including soil vapor screening measurements performed as part of the site investigation/remediation efforts during the period for which the chronology was requested even if previously provided (can be by referencing document numbers already in the COGCC document storage system). Operator generated work tickets or contractor work tickets from the time period of the chronology should be provided when pertinent to answer the questions of dates and volumes of materials removed from the Parker excavation. Provide your best estimate of the final dimensions of the excavation and volume of material disposed at landfill from the Parker excavation. One estimate of excavation size we have is that the extent was approximately 30 x 20 x 8 feet prior to final excavations at the site. That size estimate would account for approximately 165 cubic yards of excavated materials of which some or all may have been disposed at a landfill. Volumes of fill brought to the site may help in estimating final volume (dimensions) of the excavation. If you use that approach please document the fill process as part of the chronology. Rule 905.b. (including subsections describes how E&P Waste Transportation processes and also the tracking required by operators. Per rule 905.b.(3) the operator must record and document offsite of E&P wastes. Waste Generator Requirements. Any Operator that generates E&P Waste that is transported off-site will maintain, for not less than 5 years, copies of each invoice, bill, or ticket, and such other records as necessary to document the requirements listed in Rules 905.b.(3).A–F. Such records will be signed by the transporter and provided to the Director upon request.

A. The date of the transport;
 B. The identity of the waste generator;
 C. The identity of the waste transporter;
 D. The location of the waste pickup site;
 E. The type and volume of waste; and
 F. The name and location of the treatment or disposal site.

Operator stated that up to now you have not been able to identify all parts of the waste transport and disposal documentation (in your records) required by Rules 905.b.(3).A–F. As part of the chronology please address each date on which the Operator believes E&P wastes were trucked offsite during the period specified for the chronology. Clearly indicate what contemporaneous notes or records is the basis for your statements and provide copies or notes which the statements are based on. Provide estimated volumes of material for each date on which the operator states that E&P wastes were transported offsite and indicate how such estimates were made.

Attached Documents

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

Document Num	Description	URL
402773061	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5500291
697601478	weeds at wellhead	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5500283
697601479	area of excavation/remediation to top center of pad with weeds	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5500284