

**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:

12/09/2021

Submitted Date:

12/13/2021

Document Number:

691201533

**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Graber, Candice (Nikki) 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

2 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         |
|-----------------|-------|---------------------------------|-----------------|
| , KPK           |       | cogcc@kpk.com                   | All Inspections |
| Axelson, John   |       | john.axelson@state.co.us        |                 |
| Jeff Rickard    |       | JRickard@kpk.com                |                 |
| Marcom          |       | PrimaryContractor@marcomllc.net |                 |
| Ray Gorka       |       | RGorka@kpk.com                  |                 |
| Deranleau, Greg |       | greg.deranleau@state.co.us      |                 |

**Inspected Facilities:**

| Facility ID | Type             | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------------------|--------|-------------|------------|---------|---------------|-------------|
| 481051      | SPILL OR RELEASE | AC     | 11/05/2021  |            | -       | Morgan A #1   | EI          |

**General Comment:**

This is an environmental inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.

This FIR is being input to document COGCC inspections on 12/2/2021, 12/3/2021 and 12/9/2021 of the Morgan 1A Spill ID #481051.

On December 2, 2021 COGCC conducted a routine inspection of the spill area and remedial excavation. During the inspection COGCC observed an open remedial excavation approximately 25' by 40' by 15' deep with pipelines exposed. A ramp was present to allow work access. The excavation was surrounded by plastic orange construction fencing attached to T-Posts with wire; the fence was partially down. No signage was present and no other methods of site control were being utilized. A second smaller excavation was open for flowline repair access and was also surrounded by similarly installed orange construction fencing. Multiple stockpiles of soil were present on the location; there was no signage indicating if the stockpiles were E&P waste or clean overburden. Due to the proximity of residences, COGCC contacted KPK via email to alert them to the downed/inadequate fencing; the correspondence is included as an attachment.

On December 3, 2021 COGCC returned to the location and observed the orange construction fencing had been repaired. No other changes were observed.

On December 9, 2021, COGCC witnessed confirmation sampling by a third party contractor and KPK roustabout crews; Jeff Rickard from KPK was on location to oversee the sampling event. COGCC discussed the site security and multiple soil stockpiles with the third party contractor and KPK. COGCC inspectors inquired about the status of the different stockpiles and noted that per Rule 913.b.(5)B.iv Operator is required to install signs on stockpiles of impacted material describing what the material is if the material must be stored on location for several days. COGCC directed the Operator to COGCC Guidance Document Rule 913.b.(5)Bi-v-Remediation Standards for reference.

**Location**Overall Good: ☐

|                      |   |       |            |
|----------------------|---|-------|------------|
| <b>Signs/Marker:</b> |   |       |            |
| Type                 | OTHER   |       |            |
| Comment:             | No warning or hazard signs were present at the remedial excavation or at the stockpiled soils.                              |       |            |
| Corrective Action:   | Install signage in accordance with Rule 913.b.(5)B.iv and COGCC Guidance Document Rule 913.b.(5)Bi-v-Remediation Standards. | Date: | 12/03/2021 |

|                           |              |       |  |
|---------------------------|--------------|-------|--|
| Emergency Contact Number: |              |       |  |
| Comment:                  | At wellhead. |       |  |
| Corrective Action:        |              | Date: |  |

Overall Good: ☒

|                |      |        |  |  |
|----------------|------|--------|--|--|
| <b>Spills:</b> |      |        |  |  |
| Type           | Area | Volume |  |  |

In Containment: No

Comment: ☐ Multiple Spills and Releases?

|                    |   |       |            |
|--------------------|---|-------|------------|
| <b>Fencing/:</b>   |   |       |            |
| Type               | OTHER   |       |            |
| Comment:           | Due to the sensitive nature of this locaiton, installed orange construction fencing is not adequate to restrict access to the excavation. |       |            |
| Corrective Action: | Install fencing to comply with Rule 913.b.(5).B.i and Guidance Document Rule 913.b.(5)Bi-v-Remediation Standards                          | Date: | 12/03/2021 |

|                    |  |       |  |
|--------------------|--|-------|--|
| <b>Venting:</b>    |  |       |  |
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

|                    |  |       |  |
|--------------------|--|-------|--|
| <b>Flaring:</b>    |  |       |  |
| Type               |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |



**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: COGCC witnessed confirmation soil sampling on 12/9/2021. No groundwater was observed in the excavation. A third party contractor provided technical oversight for KPK crews during the sampling event.

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

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: Multiple soils piles are present on location. Plastic liners were present under soils and adequate stormwater BMPs were in place. Soils piles did not have signs demarking the type of soils stored.

See CA under Location signs/markers.

Corrective Action \_\_\_\_\_ Date: \_\_\_\_\_

**Spill/Remediation:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

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   |
|--------------|----------------|---|
| 691201534    | Correspondence | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5605465">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5605465</a> |
| 691201535    | Photo Log      | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5605466">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5605466</a> |