

**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:

02/25/2022

Submitted Date:

03/25/2022

Document Number:

702700012**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Anderson, Laurel 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:**7 Number of Comments2 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           |
|---------------|-------|---------------------------------|-------------------|
| Gorka, Ray    |       | RGorka@kpk.com                  | KPK environmental |
| KPK           |       | cogcc@kpk.com                   | All Inspections   |
| Rickard, Jeff |       | JRickard@kpk.com                | KPK environmental |
| Graber, Nikki |       | nikki.graber@state.co.us        |                   |
| MarCom        |       | primarycontractor@marcomllc.net |                   |
| Axelson, John |       | john.axelson@state.co.us        |                   |

**General Comment:**

This is an environmental inspection of the I-33 Flowline spill/release (481679). A COGCC representatives Nikki Graber, Alex Ahmadian and Town of Erie LGD arrived onsite to perform an Environmental Inspection and initial spill response activities plus sampling oversight on February 25, 2022. At the time of inspection KPK crews were on site to excavate soil impacts and collect soil samples.

While onsite KPK excavated impacted surficial soil from the source area and stockpiled the impacted soil nearby.

KPK collected grab soil samples throughout the excavation extent and a COGCC representative collected three soil samples. COGCC soil sample PIDs ranged from 7.3 to 68.5 ppm. The 68.5 ppm sample (taken from the bottom of the excavation at ~4' bgs - BH-1@4') was submitted by COGCC for laboratory analysis of organic compounds in soil. The grab sample was packed in laboratory provided jars using standard environmental practices and immediately place on ice. The sample was submitted to Pace Analytical under standard chain of custody and analyzed for Organic Compounds in Soils listed in Table 915-1.

The Laboratory Analytical Report for the COGCC confirmation grab soil sample is attached to this Inspection Report. Results indicate TPH (524 mg/kg) exceeded the Residential Soil Screening Level Concentration allowable by COGCC. Additionally, multiple additional organic compounds exceeded the COGCC allowable risk based the protection of groundwater soil screening level concentrations.

Based on the analytical results soils in exceedance of Table 915-1 remain in situ. Additional excavation and sampling is required by Operator. Operator is required to notify COGCC EPS Nikki Graber at minimum 48 hours prior to additional sample collection.

Any corrective actions from previous Forms that have not been addressed are still applicable.

Photos attached to document site conditions at the time of inspection.

**Location**Overall Good: ☒

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

Overall Good: ☒**Spills:**

Type

Area

Volume

In Containment: No

Comment:

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

Type OTHER

Comment: Orange construction fence was installed surrounding the excavation at the end of work.

Corrective Action:

Date:

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:

Date:

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

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

Comment: The spill (oil, condensate, and produced water) appears to have occurred from the I-33 off-location flowline. Operator reported between 0 and 1 bbl of oil, condensate and produced water was released (see corrective action below). Operator shall submit a Supplemental Form 19 with any information not provided in the Form 19i (See corrective action below).

Corrective Action: Operator shall comply with COAs on Doc #402972110. Operator shall provide at minimum 48 our notice to COGCC EPS Nikki Graber (Nikki.Graber@state.co.us) prior to any sampling or further excavation/backfill activities performed on location.

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: KPK excavated impacted surficial soil from the source area and stockpiled the impacted soil nearby.

Stockpiled soils on location were not labeled or lined and BMP's are not adequate for the size of the stockpile (see photographs).

Corrective Action: Manage waste in compliance with Rule 913.b.iv and COGCC Guidance 913.b.(5)B i-v

Date: 03/25/2022

**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   |
|--------------|---|---|
| 702700013    | I-33 Flowline COGCC Confirmation Soil Sample Laboratory Analytical Report | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704639">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704639</a> |
| 702700014    | I-33 Flowline Excavation and Stockpiled Soil                              | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704640">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704640</a> |
| 702700015    | Exposed I-33 Flowline   | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704641">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704641</a> |
| 702700016    | I-33 Flowline Stockpiled Soil   | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704642">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5704642</a> |