

**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:

03/25/2022

Submitted Date:

03/28/2022

Document Number:

702700026**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:8 Number of Comments3 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
Marcom	208-201-8280	PrimaryContractor@marcomllc.net	KPK Primary Contractor
Gorka, Ray		RGorka@kpk.com	KPK environmental
Rickard, Jeff		JRickard@kpk.com	KPK environmental
Graber, Nikki		nikki.graber@state.co.us	

General Comment:

This is a field inspection form for environmental inspections at the E. Stieber Consolidation spill/release (Facility ID 480275). COGCC representatives met KP Kauffman (KPK) representatives (and subcontractors) onsite three times in February and March 2022 to perform site inspections, collect confirmation soil samples and oversee remedial activities. Below is a summary of the sampling/oversight activities performed by date:

February 14, 2022:

While onsite the COGCC representative met with KPK's primary contractor (MarCom). MarCom collected grab soil samples from potholes installed north of the excavation, across CR8. The COGCC representative collected one confirmation grab soil sample (PH-2@5'). The grab sample was packed in laboratory provided jars using standard environmental practices and immediately placed on ice. The sample was submitted to Pace Analytical under standard chain of custody and analyzed for the following Table 915-1 constituents: TPH, SAR, EC, pH, BTEX, naphthalene, 1,2,4-trimethyl benzene, 1,3,5-trimethylbenzene.

The Laboratory Analytical Report for the COGCC confirmation grab soil sample is attached to this Inspection Report. Results indicate constituents analyzed were below the COGCC Table 915-1 allowable levels with the exception of pH (8.95). Based on the analytical results soils in exceedance of Table 915-1 remain in situ.

March 2, 2022:

While onsite the Inspectors met with two KP Kauffman (KPK) representatives and a representative from KPK's primary contractor (MarCom). MarCom collected grab soil samples throughout the excavation and a COGCC representative collected five confirmation grab soil samples (SW-5@8', SW-12@8', SW-14@8', SW-16@8' and BH-3@9'). The grab samples were packed in laboratory provided jars using standard environmental practices and immediately placed on ice. The samples were submitted to Pace Analytical under standard chain of custody and analyzed for the following Table 915-1 constituents: TPH, SAR, EC, pH, BTEX, naphthalene, 1,2,4-trimethyl benzene, 1,3,5-trimethylbenzene.

The Laboratory Analytical Report for COGCC confirmation grab soil samples is attached to this Inspection Report. Results indicate all samples had exceedences of Table 915-1 allowable levels for one or more of the constituent(s) analyzed with the exception of SW-13@6' which was reported below the COGCC allowable levels for the constituents analyzed. Based on the analytical results soils in exceedance of Table 915-1 remain in situ.

March 25, 2022:

While onsite the Inspectors met with three KP Kauffman (KPK) representatives, one representative from KPK's primary contractor (MarCom) and three representatives from Remington Technologies, LCC. A portion of the groundwater in the northwest corner of the excavation was pumped into a storage tank onsite. Remington applied 1,000 lbs of granular activated carbon and 2,000 lbs of powdered activated carbon throughout the previously COGCC approved application areas within the excavation.

Any corrective actions from previous inspections that have not been addressed are still applicable. Photos are attached to document site conditions at the time of each inspection.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	DEBRIS		
Comment:	Trash and debris onsite. Oil absorbent pads left within excavation.		
Corrective Action:	Comply with Rule 606.		Date: 03/02/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type	OTHER		
Comment:	Orange construction fencing surrounding the perimeter of the excavation requires maintenance and is not installed properly in order to provide adequate protection of public safety (does not effectively prevent access to the excavation when unattended).		
Corrective Action:	Install fencing to control site access.		Date: 03/25/2022

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Reclamation - Storm Water - Pit**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [See attached photo of falling/inadequate silt fence.](#)

Corrective Action: [Comply with Rule 1002.f.](#)

Date: 03/25/2022

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
702700027	Falling silt fence	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706187
702700028	Debris north of excavation.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706188
702700029	Debris north of dewatering tank.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706189
702700030	Gap in excavation fencing	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706190
702700031	Oil absorbent pads within excavation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706191
702700032	Inadequate silt fence	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706192
702700033	Gap/failing excavation fencing	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706193
702700034	Free product & Groundwater in excavation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706194
702700036	GAC application	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706195
702700037	Tear in excavation fencing - GAC application	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706196
702700038	Oil absorbent pads within excavation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5706197