

**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:

05/22/2023

Submitted Date:

05/24/2023

Document Number:

710100026

FIELD INSPECTION FORMLoc ID 467175 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 46290

Name of Operator: KP KAUFFMAN COMPANY INC

Address: 1700 LINCOLN ST STE 4550

City: DENVER State: CO Zip: 80203

Status Summary:

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

13 Number of Comments

9 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
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Meis, Craig		cmeis@kpk.com	KPK Environmental
Graber, Nikki		nikki.graber@state.co.us	
KPK		cogcc@kpk.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467173	TANK BATTERY	AC	09/03/2019		-	KPK Tank Battery 28SWNE	EI
476532	SPILL OR RELEASE	CL	10/27/2020		-	HORST-SCHUTT PW Storage Vessel	EI

General Comment:

This is an environmental inspection in response to complaint (Doc #403408837) for KP Kauffman (KPK):

HORST-SCHUTT PW Storage Vessel Spill

Spill ID: #476532

Spill Date of Discovery: May 18, 2020

Remediation Projects: #23124 & #14115

Location ID: #467175

Both Remediation Projects are late on quarterly reporting.

Current site status: Produced water vessel excavation remains open, groundwater has infiltrated the excavation, sidewalls are collapsing, fencing is downed, horizontal separator, ECD and (2) crude oil ASTs have been removed, associated on-location piping and earthen secondary containment berm remain on location.

COGCC performed inspection on May 22nd, 2023.

No crews were onsite.

Any corrective actions from previous inspections or forms that have not been addressed are still applicable.

Photos are attached to document site conditions.

LocationOverall Good: ☐**Signs/Marker:**

Type	BATTERY		
Comment:	Location entrance and tank battery signage are inadequate/missing.		
Corrective Action:	Install signage to comply with 605 series Rules.		Date: 06/22/2023

Emergency Contact Number:

Comment:		
Corrective Action:		Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused/out of service equipment (on location flowlines/piping).		
Corrective Action:	Comply wiith Rule 606.		Date: 06/07/2023
Type	WEEDS		
Comment:	Ongoing issue: Weeds observed throughout location and within the open excavation.		
Corrective Action:	Comply with Rule 606.c.		Date: 05/31/2023
Type	TRASH		
Comment:	Ongoing issue: Trash observed on location and within open excavation.		
Corrective Action:	Operator shall comply with Rules 606.d.(1)-(3) and 906.a.-d.		Date: 05/31/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type	OTHER		
Comment:	Ongoing issue: Inadequate fencing around open excavation. Fencing around excavation is partially downed - excavation sidewalls are unstable and collapsing.		
Corrective Action:	Operator shall immediately install, repair and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by rule 913.b.(5)B.i and COGCC Guidance 913.b.(5)B i-v which requires Operators fence or cover open remediation excavations to prevent access when sites are no.t attended. The site was not attended at the time of the inspection.		Date: 05/24/2023

Equipment:

Type: Flow Line	#		corrective date
Comment:	Multiple historically abandoned and out of service flowlines are exposed in the excavation.		
Corrective Action:	These flowlines must be abandoned per Rule 1105. (open flowline cut ends must be sealed per 1105.e.4).		Date: 06/22/2023

Venting:

Yes/No			
Comment:			

Corrective Action:		Date:	
Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	467173	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	EI
Facility ID:	476532	Type:	SPILL OR	API Number:	-	Status:	CL	Insp. Status:	EI
Complaint									
Comment:	COGCC Environmental Inspection in response to landowner complaint of property damage and spills/soil contamination. See Complaint (Doc #403408837) for a detailed description of complaint and associated photo documentation. Environmental Protection Specialist Assigned: Laurel Anderson Location ID: 467173 Spill/Release ID: 476532 Inspection (Doc #710100026)								
Corrective Action:	Refer to location, environmental, reclamation sections and inspection photos for corrective actions and documentation of site conditions at the time of inspection.							Date:	

Environmental**Spill/Remediation:**

Comment:	<p>Spill excavation is open. Excavation was filled with weeds and trash and groundwater was visible in the bottom of the open excavation. Several flowlines extend into the open excavation from the southern wall. One monitoring well remains on location, one has been damaged and has fallen into the western portion of the excavation.</p> <p>Quarterly reporting is required the associated remediation projects. Operator is not in compliance with Rule 913.e.(3).</p> <p>Remediation Project #14115 last approved Supplemental Form 27 received on 8/17/2021 (Doc #402782981) - 644 days late.</p> <p>Remediation Project #23124 last approved Form 27 (initial) received on 5/11/2022 (Doc #403044998) - 287 days late.</p>	
Corrective Action:	<p>In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule. Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated.</p> <p>Corrective Action date back dated to the last Form 27s due date for Remediation Project #23124.</p>	Date: 08/09/2022

Emission Control Burner (ECB): _____

Comment: _____

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

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: [No BMPs in place to control stormwater run-in or runoff.](#)

Corrective Action: [Install BMPs in accordance with 1002.f.\(2\) to prevent erosion, run-on/off into the open excavation and off location.](#)

Date: 06/06/2023

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
403412032	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6124425
710100027	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6124422