

**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:

06/01/2023

Submitted Date:

06/05/2023

Document Number:

710100032

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.
, KPK		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	

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 as reported on Initial Form 19, Spill/Release Report (Doc #402403843) for the spill (Spill/Release Point ID: 476532):
 May 18, 2020
 Initial date spill was observed by COGCC Inspectors: June 16, 2019
 Remediation Projects: #23124 & #14115
 Location ID: #467175
 Both Remediation Projects are late on quarterly reporting.
 Current site status: Produced water vessel excavation remains open, water 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 June 1st, 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:	Per CA on Doc #710100026: Install signage to comply with 605 series Rules.	Date:	06/22/2023

Emergency Contact Number:

Comment:		Date:	
Corrective Action:		Date:	

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused/out of service equipment (on location flowlines/piping).		
Corrective Action:	Per CA on Doc #710100026: Comply with Rule 606.	Date:	06/07/2023
Type	TRASH		
Comment:	Ongoing issue: Trash observed on location and within open excavation.		
Corrective Action:	Per CA on Doc #710100026: Operator shall comply with Rules 606.d.(1)-(3) and 906.a.-d.	Date:	05/31/2023
Type	WEEDS		
Comment:	Ongoing issue: Weeds observed throughout location and within the open excavation.		
Corrective Action:	Per CA on Doc #710100026: Comply with Rule 606.c.	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:	Fencing appears to have been partially repaired since previous inspection; However, a portion of the fencing is torn. 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 not attended. The site was not attended at the time of the inspection.	Date:	06/06/2023

Equipment:

Type: Flow Line	#		corrective date
Comment:	Multiple historically abandoned and out of service flowlines are exposed in the excavation.		
Corrective Action:	Per CA on Doc #710100026: 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			
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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 Inspections (Doc #710100026 & #710100032)								
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**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Spill excavation is open. Excavation was filled with weeds and trash and water was visible in the bottom of the open excavation. Several flowlines extend into the open excavation from the southern wall. Two monitoring wells remain on location, one has been damaged and has fallen into the western portion of the excavation. Quarterly reporting is required the associated remediation projects. Operator is not in compliance with Rule 913.e. (3). Remediation Project #14115 last approved Supplemental Form 27 received on 8/17/2021 (Doc #402782981). Remediation Project #23124 last approved Form 27 (initial) received on 5/11/2022 (Doc #403044998).

Corrective Action: 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. Corrective Action date back dated to the last Form 27s due date for Remediation Project #23124.

Date: 08/09/2022

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

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 adequate 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

COGCC Comments

Comment	User	Date
Initial date spill date as observed by COGCC Inspectors (Field Inspection Report Doc #693500833): July 16, 2019	andersoln	06/05/2023
Spill Date of Discovery as reported on Initial Form 19, Spill/Release Report (Doc #402403843) for Spill/Release Point ID: 476532: May 18, 2020		
Pursuant to Rule 913.d.(1)., KP Kauffman Company, Inc. ("Operator") will investigate impacts to soil, groundwater, and surface water as soon as the impacts are discovered.		

Attached Documents

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

Document Num	Description	URL
710100033	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6136215