

**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:

07/28/2023

Submitted Date:

08/01/2023

Document Number:

710100045

FIELD INSPECTION FORMLoc ID _____ Inspector Name: _____ On-Site Inspection ☐
Anderson, Laurel 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

10 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 |
|---------------|----------------|--------------------------|---------------------------|
| John Peterson | | jpeterson@kpk.com | Director EHS & Compliance |
| Watzman, Ross | (303) 825-4822 | rwatzman@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 |
|-------------|------------------------------|--------|-------------|------------|-----------|--------------------------------------|-------------|
| 240568 | WELL | SI | | GW | 123-08356 | HINGLEY 1 | EI |
| 451627 | TANK BATTERY | AC | | | - | Consolidation #4 West A Battery 1 | EI |
| 475403 | OFF- LOCATION FLOWLINE | AC | 01/08/2021 | | - | Wellhead Line 28NENE | EI |

General Comment:

This is an environmental inspection for:
 HINGLEY 1 well API 123-08356
 Consolidation #4 West A Battery 1 Facility ID 451627
 Spill ID 484760 (Hingley #2 Flowline).

Any corrective actions from previous forms in relation to the above which have not been addressed are still applicable.

Operator personel were on location at the time of this field inspection (13:50-14:10); However, no work was being conducted. Additional Operator personnel arrived on location at ~14:05.

Photos attached to document site conditions.

Excavation extent is:
 ~470' from an occupied structure
 ~320' from a freshwater emergent wetland
 ~320' from an irrigation ditch
 Within a the Town of Frederick

LocationOverall Good: ☐

| | | | |
|----------------------|--|-------|------------|
| Signs/Marker: | | | |
| Type | TANK LABELS/PLACARDS | | |
| Comment: | Tank labels are inadequate. | | |
| Corrective Action: | Operator shall comply with Rule 605.h. | Date: | 08/31/2023 |

| | | | |
|---------------------------|--|-------|--|
| Emergency Contact Number: | | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

| | | | |
|---------------------------|--|-------|------------|
| Good Housekeeping: | | | |
| Type | UNUSED EQUIPMENT | | |
| Comment: | A partially removed flowline (capped on one end) was observed on location with no lock out tags. The status of the flowline is unknown. | | |
| Corrective Action: | Operator shall comply with Rule 606 for unused equipment and applicable 1100 series Rules for flowlines to be abandoned or whose status has changed from active to out of service. | Date: | 08/16/2023 |
| Type | WEEDS | | |
| Comment: | Weeds observed on location. | | |
| Corrective Action: | Comply with Rules 606.c. and 1003.f. | Date: | 08/08/2023 |
| Type | OTHER | | |
| Comment: | Stained soil observed within the crude oil AST earthen secondary containment berm. | | |
| Corrective Action: | Comply with Rule 1002.f.(2).D - Conduct maintenance on equipment, cleanup stained material and review self inspection processes and properly dispose of oily waste in accordance with 905.e. | Date: | 08/15/2023 |

Overall Good: ☐

| | | | | |
|--------------------|---|--------|--|------------------|
| Spills: | | | | |
| Type | Area | Volume | | |
| PW/CO | | | | |
| Comment: | Stained soil was observed extending from the southern end of horizontal separator to the west ~45'. Two excavations were observed. One near the southern end of the horizontal separator and one along the flowline to the south of the horizontal separator. | | | |
| Corrective Action: | In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered. | | | Date: 08/02/2023 |

In Containment: No

Comment: ☐ Multiple Spills and Releases?

| | | | |
|------------------|---|--|--|
| Fencing/: | | | |
| Type | OTHER | | |
| Comment: | Site has open excavations adjacent to the separator and along flowline without effective or adequate means of excluding entry of people, livestock or wildlife at time of inspection. Open excavation is part of site investigation and remediation relating to Spill ID 484760 which remains open. | | |

| | | | |
|--|---|-------|------------|
| Corrective Action: | Repair and maintain best management practices to control and contain all spills/releases of E&P waste to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended. | Date: | 08/02/2023 |
| Note: Operator personnel were present off-location; however, no work was being conducted at the open excavations and fencing had not been moved to allow for additional remediation at the time of inspection. | | | |

| | | | |
|--------------------|--|-----------------|------------------|
| Equipment: | | corrective date | |
| Type: Flow Line | # | | |
| Comment: | The flowline associated with Spill ID 484760 appears to have been repaired. | | |
| Corrective Action: | Operator shall repair flowlines or crude oil transfer lines to comply with Rule 1102.j. and notify ECMC Engineering Integrity Group of repair work to date and 48-hours prior to returning the flowline back into service. | | Date: 08/02/2023 |

Tanks and Berms:

| | | | | | |
|--------------------|---|----------|----------------|---------|--------|
| Contents | # | Capacity | Type | Tank ID | SE GPS |
| PRODUCED WATER | | | PBV FIBERGLASS | | , |
| Comment: | | | | | |
| Corrective Action: | | | | | Date: |

Paint

| | | | | | |
|------------------|--|--|--|--|--|
| Condition | | | | | |
| Other (Content) | | | | | |
| Other (Capacity) | | | | | |
| Other (Type) | | | | | |

Berms

| | | | | |
|--------------------|--|---------------------|---------------------|------------------|
| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
| Earth | Inadequate | | | |
| Comment: | Secondary containment is inadequate to contain 150% of the volume of the largest tank. | | | |
| Corrective Action: | Repair or install berms or other secondary containment devices per Rule 603.o. | | | Date: 08/31/2023 |

Venting:

| | | | |
|--------------------|--|--|-------|
| Yes/No | | | |
| Comment: | | | |
| Corrective Action: | | | Date: |

Flaring:

| | | | |
|--------------------|--|--|-------|
| Type | | | |
| Comment: | | | |
| Corrective Action: | | | Date: |

| Inspected Facilities | | | | | | | | | |
|----------------------|--------|-------|------|-------------|-----------|---------|----|---------------|----|
| Facility ID: | 240568 | Type: | WELL | API Number: | 123-08356 | Status: | SI | Insp. Status: | EI |
| Facility ID: | 451627 | Type: | TANK | API Number: | - | Status: | AC | Insp. Status: | EI |
| Facility ID: | 475403 | Type: | OFF- | API Number: | - | Status: | AC | Insp. Status: | EI |

Environmental**Waste Management:**

| Type | Management | Condition | GPS (Lat) | (Long) |
|-------------------------------|--|-----------|-----------|------------------|
| Drums, Buckets, Containers | | | | |
| Comment | 5-gallon buckets were observed west of the horizontal separator, adjacent to stained soil. | | | |
| Corrective Action | Comply with Rule 606. | | | Date: 08/15/2023 |

Spill/Remediation:

| | | | |
|--------------------|--|-------|--|
| Comment: | | | |
| Corrective Action: | | Date: | |

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: | | <p>No BMPs in place to control stormwater runoff. No BMPs have been installed surrounding the excavations nor the stained soil remaining insitu. No BMPs have been installed around the perimeter of the location; sediment is being transported off location onto the adjacent property.</p> | | | | |
| Corrective Action: | | Install BMPs in accordance with 1002.f. | | | | Date: 08/08/2023 |
| Pits: <input type="checkbox"/> 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 |
|--------------|---------------------|---|
| 710100046 | Photo Documentation | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6202331 |