

FORM
INSPRev
X/20State of Colorado
Oil and Gas Conservation Commission1120 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:

710100041

FIELD INSPECTION FORM

 Loc 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:

- 11 Number of Comments
- 8 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.
Graber, Nikki		nikki.graber@state.co.us	
John Peterson		jpeterson@kpk.com	Director EHS & Compliance

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478673	OFF- LOCATION FLOWLINE	AC	12/02/2020		-	Wellhead Line	EI

General Comment:

This is an environmental inspection for Spill ID 482598 (3 Farms Consolidation Line). Any corrective actions from previous forms in relation to Spill ID 482598 that have not been addressed are still applicable. There were no Operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Excavation extent is:

- ~340' from a potable household/domestic well and occupied structure
- ~175' from landowner shop
- ~325' from wetlands
- ~400' from 100-year floodplain
- ~325' from an irrigation ditch
- ~400' from Big Dry Creek
- Within a high priority habitat

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds observed throughout location.		
Corrective Action:	Comply with Rules 606.c. and 1003.f.	Date:	08/08/2023
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment remains within the excavation.		
Corrective Action:	Comply with Rule 606.	Date:	08/04/2023

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type	OTHER		
Comment:	Site has open excavation 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 482598 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. the site was not attended at the time of the inspection.	Date:	08/02/2023

Equipment:

Type: Flow Line	#		corrective date
Comment:	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:	08/15/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 478673 Type: OFF- API Number: - Status: AC Insp. Status: EI

Complaint

Comment: A complaint (Doc #403444307) was received on June 24, 2023, for the open excavation behind the property owner's hay barn at 10467 CR 8, Ft. Lupton, CO 80621 related to Spill ID 482598. The complaint states: "This hole in my property has been abandoned for over 3 months. I have contacted KPK as well as Marcom and the COGCC with no resolution. I have not received and water quality reports even though my drinking water well is within a few hundred feet of this area. My driveway continues to degrade due to the daily traffic back to the site. Apparently, someone comes out daily to check on the hole. Other than that, nothing has been done since before March of this year. I'm losing revenue because I can't lease my pasture for grazing. I got a quick response from Nikki Graber back in March about fencing around the hole, but the fencing KPK installed was inadequate to contain the animals. If someone could give me an update on the progress of this project, I'd be very grateful. I'd like to have my property and privacy back."

Corrective Action: **ECMC issued a Notice of Alleged Violation (NOAV) on July 14, 2023, for the following reason: "Operator failed to prevent pollution and adverse environmental impacts on air, water, soil, or biological resources resulting from Oil and Gas Operations and failed to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources, and prevent the unauthorized discharge of oil, violating Rule 902."**

Operator (KP Kauffman) is required to comply with all conditions of approval and corrective actions for all remaining remediation of soil and groundwater impacts, reclamation and reporting established for ECMC Spill ID 482598.

Date: 07/14/2023

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Operator failed to submit an approvable Form 27, Site Investigation and Remediation Workplan and Form 19, Supplemental Spill/Release Report requesting closure no later than 90 days after the discovery of a Spill or Release, violating Rule 912.b.(6).As of August 1, 2023, the required forms are 287 days late.

Corrective Action: Operator shall submit a replacement Form 27, Site Investigation and Remediation Workplan, and a Supplemental Form 19, Spill/Release Report requesting closure of Spill/Release Point ID: 482598. An NOAV (Doc #403465295) has been issued with a corrective action due date of 8/13/2023. Date: 08/13/2023

Reportable: YES GPS: Lat 40.042275 Long -104.857990

Proximity to Surface Water: 325 Depth to Ground Water: 8

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					
Comment	Oily waste was previously stockpiled on location west of the open excavation. Material was placed on a liner; however, the liner was compromised and the remaining soil has transported off the liner onto adjacent land.				
Corrective Action	Manage stockpiles in compliance with Rule 1002.(c). Manage waste in compliance with Rule 913.b.(3) and ECMC Guidance 913.b.(5)B.i-v. and collect soil samples from the stockpile area for laboratory analysis of all Table 915-1 contaminants of concern.				Date: <u>08/22/2023</u>

Spill/Remediation:

Comment:

Corrective Action: Date: 08/13/2023

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: An ~100'x50'x8' excavation remains open. Water was observed within the open excavation at the time of inspection. No BMPs are in place to control stormwater run-on to the open excavation nor runoff from the work area. Gulley's have formed from runin to the excavation and are beginning to destabilize the walls of the excavation and fencing.

Corrective Action: Install BMPs in accordance with 1002.f.(2) to prevent run-on and runoff.

Date: 08/08/2023

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
403483786	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6202332
710100042	NOAV	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6202329
710100044	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6202330