

**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:

08/09/2023

Submitted Date:

09/11/2023

Document Number:

697602149

FIELD INSPECTION FORM

Loc ID	Inspector Name: Ahmadian, Alexander	On-Site Inspection <input type="checkbox"/>	2A Doc Num:	Status Summary: <input type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED
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				Findings: 13 Number of Comments 6 Number of Corrective Actions <input checked="" type="checkbox"/> 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
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David Romero		romero.david@epa.gov	Federal On-Scene Coordinator
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MacLaren, Joe		joe.maclaren@state.co.us	
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Ahmadian, Alexander		alexander.ahmadian@state.co.us	
John Peterson		jpeterson@kpk.com	Director EHS & Compliance
Heather Young		heather.young@state.co.us	Field Services Section Manager

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
484896	SPILL OR RELEASE	AC	08/16/2023		-	Facility 9 Section 1415 Corp Unit C	EI

General Comment:

This is an Environmental inspection to document spill response and remediation activities at KP Kauffman's Facility 9 Section 1415 Corp Unit C spill (Spill ID #484896) associated with Flowline Facility ID #478843. Operator personnel and an EPA representative were on location during the time of the inspection.

Any corrective actions/conditions of approval from previous inspections/forms that have not been addressed remain applicable. Photos are attached to document site conditions at the time of the inspections.

Approximate timeline of on-location activities on August 9, 2023:

- 10:10 arrive on location with Taylor Robinson and begin documentation
- 10:20 Discuss safety overview and review JSA with Operator personnel
- 10:30 Discuss workplan with the Operator. KPK was building and refortifying soil dams in order to prevent trench water from flowing through the trench. Small amounts of water were observed leaking through the existing soil dam. The soil dam was being refortified near the culvert.
- 11:00 the Operator continued to pump water into the storage tanks on location. KPK personnel was unsure how much water has been pumped into the tank.
- 11:10 KPK discusses a skimmer coming to location. However, no skimmer was observed on location while ECMC personnel was onsite.
- 12:30 EPA representative David Romero contacts EPS Alex Ahmadian to say that he will not be on location until Friday.
- 13:00 Discuss with Cullen with KPK expectations on Form 19 including the utility locates.
- 13:30 EPS' Alex and Taylor begin inspecting the trench.
 - Sediment was observed on the water mostly near booms. Sheen was not observed to the south.
 - Sheen and free product was observed near the culvert to the south. Booms, soil dams, and pig mats were installed to prevent migration.
 - To the north of the culvert, hydrocarbon odor was observed but no sheen was observed. No sediment or sheen was observed as we progressed north. Multiple BMPs were installed to prevent migration.
- 14:00 Photo documentation. No soil was observed on the stockpile liner. KPK had transferred contaminated soil directly to soil trucks.
- 14:15 JT Consulting personnel arrived onsite for routine inspection.
- 14:45 EPS' Alex and Taylor off location.

KPK personnel did not discuss a sampling plan. It was determined that sampling was still to be decided. KPK personnel acknowledged Form deadlines and workplans.

The spill extent is located:

- In Weld County on a parcel owned by City of Thornton
- Adjacent to cropland
- Within a USFWS National Wetlands Inventory buffer for a Freshwater Emergent wetland.
- <10' east of surface water (Big Dry Creek)
- Within 100-year floodplain
- Within 1/4 mile of a(n): occupied structure, livestock, 1/2 mile buffer for active bald eagle nest, additional surface water, riverine wetland, CR 18, and agricultural land.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good: ☐**Spills:**

Type	Area	Volume		
Comment:	Gross free product and hydrocarbon sheen were observed on surface water within the trench ~8' east of the creek. Water from the creek is continuously seeping into the trench through the western wall. Hydrocarbon mist and stained soils remain in-situ at the time of inspection.			
Corrective Action:	Operator shall control and contain spills/releases and clean up per Rule 912.a.			Date: 08/07/2023

In Containment: No

Comment:

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

Type	OTHER		
Comment:	Operators will fence or cover open trench/excavation to prevent access when sites are not attended Remediation Safety fence Rule 913.b.(5)B.		
Corrective Action:	Remediation Safety fence Rule 913.b.(5)B.		
		Date:	08/12/2023

Equipment:

Type:	#		corrective date
Comment:	A 3" steel off-location multiphase flowline was struck by a third party contractor. The flowline has reportedly been isolated at the time of this inspection; however, the flowline cannot be accessed due to water infiltrating the trench where the flowline was struck.		
Corrective Action:	Operator will ensure the flowline is isolated and depressurized; wells and isolation valves are SI/OOSLAT to prevent an unintentional release. Operator shall provide information/documentation of any utility locate requests/markings of the flowline prior to the date of the spill. Operator shall provide a copy of the latest flowline pressure testing data and chart, as well as, provide a map (and GPS coordinates) depicting location of the valves used to isolate the flowline by means of a Form 19 Supplemental Report, or if the spill report has been closed, by means of a Supplemental Form 27.		
		Date:	08/19/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil				
Comment	Stained soil from spill remains in-situ.			
Corrective Action	Action Properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts to the next Supplemental Form 19 per Rule 905.b.(3).			Date: 08/13/2023
Comment	Oil absorbent mats and booms were in place at the time of inspection. Mats were observed floating on the surface adjacent to the source area and booms installed at routine intervals between the source area and the culvert adjacent to the earthen dam (~600' north of the source). Earthen dam has been breached and is no longer adequate to stop the spread of visibly impacted water. Water and free product have extended beyond the earthen dam and the final oil absorbent boom adjacent to the culvert.			
Corrective Action	Operator shall install booms properly to completely cover the surface of the stream, booms should be replaced when saturated to prevent desorption. Note: Operator has been instructed to collect additional samples based on these observations.			Date: 08/13/2023

Spill/Remediation:

Comment:	Initial spill response activities included skimming and dewatering. The hydrovac crews skimmed free product while a dewatering pump was used to transfer water from within the trench into frac tanks/trucks for offsite disposal. Visibly impacted water from within the trench has spilled onto the ground adjacent to the trench to the east and south of the source area. See photo documentation.			
Corrective Action:	Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Collect soil samples from areas where visibly impacted water was observed outside the source area and trench and submit for laboratory analysis of Full Table 915-1 Contaminants of Concern.			Date: 08/29/2023

Emission Control Burner (ECB): _____

Comment: _____

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

COGCC Comments

Comment	User	Date
KPK personnel did not discuss a sampling plan. It was determined that sampling was still to be decided. KPK personnel acknowledged Form deadlines and workplans.	ahmadiaa	09/11/2023

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

Document Num	Description	URL
403526174	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6247368
697602150	Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6247360