

**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:

09/21/2023

Submitted Date:

09/25/2023

Document Number:

710100060

FIELD INSPECTION FORMLoc ID 318201 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:

11 Number of Comments

5 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
Graber, Nikki		nikki.graber@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478014	SPILL OR RELEASE	CL	09/04/2020		-	James S Haley Trustee B #2 Flowline	EI

General Comment:

COGCC environmental inspection to determine progress on Spill ID 478014/Remediation 16137. This is an environmental inspection. Any corrective actions from previous inspections 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.

Incident information:

Spill Discovery Date: 9/4/2020

Days open: 1116 days (as of 9/25/2023)

Last report: 1/11/2023 Operator is not in compliance with quarterly reporting

Supplemental Form 27 Due Date: 4/11/2023 (as of 9/25/2023 the quarterly Supplemental Form 27 is 167 days late).

Current site status:

-Excavation open and fenced with a mix of cattle panel and orange construction fence.

-Previous inspections (during sampling and a followup inspection) indicated visible impacts remained in situ beneath the Operators flowline on the western edge of the current excavation extent. During sampling oversight in January of 2023, Operator's environmental contractor indicated additional excavation was forthcoming. No additional excavation has been performed.

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	No signage present at excavation (No warning/safety signage, no emergency contact information)		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action: Date:

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds observed on location and within the open excavation.		
Corrective Action:	Comply with Rule 606.	Date:	10/09/2023
Type	TRASH		
Comment:	Trash observed within the open excavation.		
Corrective Action:	Comply with Rule 606.	Date:	10/09/2023

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?

Equipment:			corrective date
Type: Other	#		
Comment:	Excavation open and fenced with a mix of cattle panel and orange construction fence.		
Corrective Action:		Date:	

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:	Based on the analytical results and field observations, soil in exceedance of Table 915-1 remains in situ. Additional excavation and sampling is required by Operator.			
Corrective Action:	Per Rule 913.d.(2) Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule within 14 days. In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.			Date: 10/09/2023

Spill/Remediation:

Comment:	Operator is not in compliance with Rule 913.e. and previously applied Conditions of Approval. Last Quarterly Report Received: 1/11/2023 Subsequent Quarterly Report Due Date: 4/11/2023 (as of 9/25/2023 the quarterly Supplemental Form 27 is 167 days late).			
Corrective Action:	Per COA on Document Numbers: 402744796, 402924348, 403044934 "Operator shall submit Quarterly Updates every 90 days including a detailed project summary and status, as required by Rule 913.e. Quarterly updates shall include a current map of the subject location including current excavation limits, soil boring locations, and monitoring well locations. GPS data used to create the map must comply with COGCC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit field notes of all field activities reported during a Quarterly Update." Operator shall comply with Rule 913.e. Corrective Action Due Date back dated based on last quarterly update report received.			Date: 04/11/2023

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
Tracking Pad	Fail					

Comment: -No BMPs are in place to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite and site degradation.
-Stormwater run-in to the open excavation has resulted in rill erosion, wall destabilization and transport and accumulation of stormwater and sediment within the open excavation.
-Vehicle trackout was observed on Sunshine Drive.

Corrective Action: Operator shall comply with Rule 1002.f.

Date: 10/09/2023

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
403539748	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262526
710100061	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262525