

**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:

710100062

**FIELD INSPECTION FORM**

Loc ID \_\_\_\_\_ Inspector Name: Anderson, Laurel On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- 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:**

- 20 Number of Comments
- 14 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
Wold, Reed		reed.wold@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	<a href="#">all inspections.</a>
, KPK		cogcc@kpk.com	<a href="#">All Inspections</a>
Peterson, John	303-550-8872	jpeter@kpk.com	<a href="#">Director EHS &amp; Compliance</a>
Graber, Nikki		nikki.graber@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
241092	WELL	PA		GW	123-08880	UPRR 43 PAN AM I 10	EI
241251	WELL	PA		OW	123-09039	UPRR 43 PAN AM I 19	EI
242122	WELL	SI		GW	123-09913	UPRR 43 PAN AM I 27	EI
242187	WELL	SI		OW	123-09978	UPRR 43 PAN AM I 33	EI
318765	LOCATION	AC			-	UPRR 43 PAN AM I-61N68W 10NWSW	EI
318801	LOCATION	AC			-	UPRR 43 PAN AM I-61N68W 10NESW	EI
465479	OFF-LOCATION FLOWLINE	AC	11/19/2020		-	Wellhead Line 10NESW	EI
470495	OFF-LOCATION FLOWLINE	AC			-	Wellhead Line	EI
481679	SPILL OR RELEASE	CL			-	I-33 Flowline	EI

**General Comment:**

This is an environmental inspection for KP Kauffman:  
Spill ID #481679  
Remediation Project #26277  
Remediation Project #23488  
Off-Location Flowline Facility IDs 465479 & 465495  
Location Name: UPRR 43 PAN AM I-61N68W#10NESW (Location ID 318801)  
Location Name: UPRR 43 PAN AM I-61N68W#10NWSW (Location ID 318765)  
Well Name & API: UPRR 43 PAN AM I 33 (API 05-123-09913)  
Well Name & API: UPRR 43 PAN AM I 27 (API 05-123-09978)  
Well Name & API: UPRR 43 PAN AM I 9 (API 05-123-09039)  
Well Name & API: UPRR 43 PAN AM I 10 (API 05-123-08880)

Operator personnel was not present during time of inspection. Photos attached to document site conditions. Inspection Date: 9/21/2023

Location			
<b>Lease Road:</b>			
Type	Access		
comment:	Access/leasehold roads have not been maintained and are difficult to traverse.		
Corrective Action:	Repair and maintain access/leasehold roads to comply with Rule 600.I.	Date:	10/23/2023
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	No wellhead signage present at UPRR 43 PAN AM I 33 Wellhead		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	10/25/2023
Type	OTHER		
Comment:	Sign not posted at oil and gas locations.		
Corrective Action:	Install sign to comply with Rule 605.a.	Date:	10/25/2023
<b>Emergency Contact Number:</b>			
Comment:	No emergency contact information available.		
Corrective Action:			Date: _____
<b>Good Housekeeping:</b>			
Type	WEEDS		
Comment:	Weeds have become overgrown and extent to heights over 5' tall in some locations. Weeds were observed along the length of flowlines, throughout all locations, at all wellheads/former wellheads, within and around open excavations making many open excavations extremely difficult to see and pose a significant safety risk.		
Corrective Action:	Operator shall comply with Rule 606.c. CA date reflects date from Insp. Doc #s: 710100016 and 689501421.	Date:	05/24/2023
Type	TRASH		
Comment:	Trash and debris (concrete, rebar, etc.) was observed near the former wellpads.		
Corrective Action:	Operator shall comply with Rules 606.d.(1)-(3) and 906.a.-d. CA date reflects date from Insp. Doc #s: 710100016 and 689501421.	Date:	05/24/2023
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment on location.		
Corrective Action:	Comply with Rule 606.a.	Date:	10/09/2023
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Fencing/:</b>			
Type	OTHER		
Comment:	Inadequate fencing around multiple open excavations.		

Corrective Action:	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 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. CA date reflects date from Insp. Doc #: 710100016 and 689501421.	Date:	05/24/2023
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**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: <u>241092</u>	Type: <u>WELL</u>	API Number: <u>123-08880</u>	Status: <u>PA</u>	Insp. Status: <u>EI</u>
Facility ID: <u>241251</u>	Type: <u>WELL</u>	API Number: <u>123-09039</u>	Status: <u>PA</u>	Insp. Status: <u>EI</u>
Facility ID: <u>242122</u>	Type: <u>WELL</u>	API Number: <u>123-09913</u>	Status: <u>SI</u>	Insp. Status: <u>EI</u>
Facility ID: <u>242187</u>	Type: <u>WELL</u>	API Number: <u>123-09978</u>	Status: <u>SI</u>	Insp. Status: <u>EI</u>
Facility ID: <u>318765</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>318801</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>465479</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>470495</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>481679</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>CL</u>	Insp. Status: <u>EI</u>

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Quarterly reporting is required for Remediation Project #23488. Operator is past due on quarterly reporting. The last approvable Supplemental Form 27 for Remediation Project #23488 was received on January 16, 2023 (Doc #403139616)

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. CA date reflects date from Insp. Doc #: 710100016 and 689501421 for Remediation Project #23488

Date: 04/16/2023

Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Comment	Multiple soil stockpiles were observed along the flowlines and next to excavation areas. Stockpiles were unmarked, unlined, and had inadequate/missing BPMs for stormwater runoff.			
Corrective Action	Manage waste in compliance with Rule 913.b.iv and ECMC Guidance 913.b.(5)B i-v. CA date reflects date from Insp. Doc #: 710100016 and 689501421			Date: 05/31/2023

**Spill/Remediation:**

Comment: Quarterly reporting is required for Remediation Project #26277. Operator is past due on quarterly reporting. The last Form 27 was submitted on November 21, 2022 (Doc #403060656).

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. CA date reflects date from Insp. Doc #: 710100016 and 689501421

Date: 02/19/2023

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment **Rule 1002.b. requires soil removal and segregation on crop land. As to all excavation operation undertaken after June 1, 1996 on crop land, the operator shall separate and store soil horizons separately from one another and mark or document stockpile locations to facilitate subsequent reclamation. When separating soil horizons, the operator shall segregate horizons based upon noted changes in physical characteristics such as organic content, color, texture, density, or consistency. Segregation will be performed to the extent practicable to a depth of six (6) feet or bedrock, whichever is shallower.**  
  
**Excavated soils have been stockpiled in numerous locations withother proper segregation.**

Corrective Action **Operator shall comply with Rule 1002.b.  
The corrective date is the date the location was observed out of compliance, as it should be in compliance with Rule 1002.b. at all times.**

Date **09/21/2023**

1002c. PROTECTION OF SOILS Fail

Comment **Rule 1002.c. requires all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.**  
  
**No BMPs in place to protect numerous soil stockpiles soils from degradation.**

Corrective Action **Operator shall comply with Rule 1002.c.  
The corrective date is the date the location was observed out of compliance, as it should be in compliance with Rule 1002.c. at all times.**

Date **09/21/2023**

1002E. SURFACE DISTRURBANCE MINIMIZATION Fail

Comment **Access roads, locations and wellpads have no been maintained to minimize surface disturbance.**

Corrective Action **Operator shall comply with Rule 1002.e.**

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_

Comment

Corrective Action

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? \_\_\_\_\_

1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_

Cuttings management: \_\_\_\_\_

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

RESTORATION AND REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment:

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: <input style="width: 95%;" type="text"/>	Date: <input style="width: 95%;" type="text"/>
Corrective Action: <input style="width: 95%;" type="text"/>	
Overall Final Reclamation <input type="checkbox"/>	Well Release on Active Location <input type="checkbox"/>
	Multi-Well Location <input type="checkbox"/>

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: <input style="width: 95%;" type="text" value="Existing stormwater BMPs have not been installed properly and/or maintained."/>	Date: <input style="width: 95%;" type="text" value="05/31/2023"/>
Corrective Action: <input style="width: 95%;" type="text" value="Comply with Rules 1002.f.(1)-(2). CA date reflects date from Insp. Doc #: 710100016."/>	

**Pits:**  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
<input style="width: 95%;" type="text" value="Operator will remain out of compliance until each corrective action has been resolved."/>	andersoln	09/25/2023

**Attached Documents**

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

Document Num	Description	URL
403540112	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262914">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262914</a>
710100064	Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262908">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262908</a>