

**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:

11/06/2023

Submitted Date:

11/07/2023

Document Number:

710100067

FIELD INSPECTION FORM

Loc ID 467175 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:

- 14 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	
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist
KPK		cogcc@kpk.com	All Inspections
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Graber, Nikki		nikki.graber@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467173	TANK BATTERY	AC	09/03/2019		-	KPK Tank Battery 28SWNE	EI
476532	SPILL OR RELEASE	CL	10/27/2020		-	HORST-SCHUTT PW Storage Vessel	EI

General Comment:

This is an environmental inspection to document site conditions and the status of the open remediation project; All unaddressed CAs from previous inspections, COAs from approved forms and comments from denied forms still apply.

Operator: KP Kauffman (KPK):

HORST-SCHUTT PW Storage Vessel Spill

Spill ID: #476532

Spill Date of Discovery as reported on Initial Form 19, Spill/Release Report (Doc #402403843) for the spill (Spill/Release Point ID: 476532):
May 18, 2020

Initial date spill was observed by COGCC Inspectors: June 16, 2019

Remediation Projects: #23124 & #14115

Location ID: #467175

Facility ID: #467173 KPK Tank Battery/28SWNE

Both Remediation Projects are late on quarterly reporting.

Current site status: Produced water vessel excavation remains open, water has infiltrated the excavation, sidewalls are unstable and continue to collapse, weeds and debris are present throughout the excavation and location, multiple uncapped flowlines are located within the excavation, clay pipe and utility lines exposed within the excavation, stormwater erosion off location and into open excavation (rills and gully's have developed), fencing is inadequate (torn, large gaps between fencing and ground, installed close to unstable sidewalls, etc.), horizontal separator, ECD and (2) crude oil ASTs have been removed, associated on-location piping and earthen secondary containment berm remain on location.

COGCC performed inspection on November 6th, 2023.

No crews were onsite.

Photos are attached to document site conditions.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	BATTERY		
Comment:	Location entrance and tank battery signage are inadequate/missing.		
Corrective Action:	Per CA on Doc #710100026, 710100032 and 697602113: Install signage to comply with 605 series Rules.	Date:	06/22/2023
Emergency Contact Number:			
Comment:	No warning/hazard placards present at open excavation.		
Corrective Action:			
Date:			
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Ongoing issue: Unused/out of service equipment (on location flowlines/piping) still on location.		
Corrective Action:	Per CA on Doc #710100026, 710100032 and 697602113: Comply wiith Rule 606.	Date:	06/07/2023
Type	WEEDS		
Comment:	Ongoing issue: Weeds observed throughout location and within the open excavation.		
Corrective Action:	Per CA on Doc #710100026, 710100032 and 697602113: Comply with Rule 606.c.	Date:	05/31/2023
Type	TRASH		
Comment:	Ongoing issue: Trash observed on location and within open excavation.		
Corrective Action:	Per CA on Doc #710100026, 710100032 and 697602113: Operator shall comply with Rules 606.d.(1)-(3) and 906.a.-d.	Date:	05/31/2023
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Ongoing issue: Inadequate fencing around open excavation.		
Corrective Action:	Operator shall immediatiately 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 and COGCC Guidance 913.b.(5)B i-v which requires Operators fence or cover open remediation excavations to prevent access when sites are not attended. The site was not attended at the time of the injection.	Date:	11/07/2023
Equipment:			
Type: Flow Line			#
Comment:	Ongoing issue: Multiple historically abandoned and out of service flowlines are atill exposed in the excavation.		
Corrective Action:	Per CA on Doc #710100026, 710100032 and 697602113: These flowlines must be abandoned per Rule 1105. (open flowline cut ends must be sealed per 1105.e.4).	Date:	06/22/2023
Venting:			
Yes/No			

Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Large empty rectangular area for detailed notes or data entry.

Inspected Facilities

Facility ID: 467173 Type: TANK API Number: - Status: AC Insp. Status: EI

Complaint

Comment:

Corrective Action:

Date:

Facility ID: 476532 Type: SPILL OR API Number: - Status: CL Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Quarterly reporting is required the associated remediation projects. Operator is not in compliance with Rule 913.e.(3). Remediation Project #14115 last approved Supplemental Form 27 received on 8/17/2021 (Doc #402782981). Remediation Project #23124 last approved Form 27 (initial) received on 5/11/2022 (Doc #403044998).

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. Corrective Action date back dated to the last Form 27s due date for Remediation Project #23124.

Date: 08/09/2022

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: _____

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: Per CA on Doc #710100026, 710100032 and 697602113: No adequate BMPs in place to control stormwater run-in or runoff.						Date: <u>06/06/2023</u>
Corrective Action: Install BMPs in accordance with 1002.f.(2) to prevent erosion, run-on/off into the open excavation and off location.						
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments		
Comment	User	Date
<ul style="list-style-type: none"> -Remedial excavation remains open. -Excavation sidewalls have not been sloped or benched, are unstable, and have partially collapsed (failed soil mass observed in base of excavation adjacent to sidewall) and are showing signs of additional collapse (tension cracks/fissures, toppling, sloughing, bulging and subsidence). -No warning placards/signage present at excavation. -Signage at former tank battery has faded and is difficult to discern. -No signage present at location entrance. -No stormwater BMPs were observed - Stormwater erosion has continued - Gulley and rills have expanded both on location (including into the open excavation) and off-location (outside the footprint of the oil and gas location). Excavation sidewalls and fencing have been undermined by erosion. -Excavation fencing installed is inadequate. To ensure the safety of the public, livestock, and wildlife near open excavations, Operator will fence or cover the excavation in a manner that prevents wildlife, livestock, and unauthorized personnel from entering the work zone when unattended. The choice of fencing or cover material used must be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc. -Weeds, trash, debris and water were observed within the base of the open excavation. -Weeds, trash, debris were observed throughout the location. -Multiple uncapped/improperly capped flowlines extend into the open excavation. -A clay pipeline has been exposed on the southeast corner of the excavation. The pipe appears to have been damaged. -A buried utility line has been cut and is exposed in the northeastern corner of the excavation. -Two monitoring wells remain on location, a third has been has fallen into the western portion of the excavation. -Operator is late on quarterly reporting required by Rule 913.e.(3) 	andersoln	11/07/2023

Attached Documents

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

Document Num	Description	URL
710100071	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6314435