

**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: \_\_\_\_\_**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:**

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   |
|----------------|--------------|---------------------------|---|
| KPK            |              | cogcc@kpk.com             | <a href="#">All Inspections</a>                       |
| Graber, Nikki  |              | nikki.graber@state.co.us  |   |
| Ferrin, Jeremy |              | jeremy.ferrin@state.co.us |   |
| Peterson, John | 303-550-8872 | jpeter@kpk.com            | <a href="#">Director EHS &amp; Compliance</a>         |
| Motisi, Dan    |              | dmotisi@kpk.com           | <a href="#">KP Kauffman - Environmental Geologist</a> |
| Watzman, Ross  | 303-825-4822 | rwatzman@kpk.com          |   |

**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: ☐

|                      |   |       |            |
|----------------------|---|-------|------------|
| <b>Signs/Marker:</b> |   |       |            |
| 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               | 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               | 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 with Rule 606.  | Date: | 06/07/2023 |
| 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: ☐

|                |      |        |  |
|----------------|------|--------|--|
| <b>Spills:</b> |      |        |  |
| Type           | Area | Volume |  |

In Containment: No

Comment: ☐ Multiple Spills and Releases?

|                    |   |       |            |
|--------------------|---|-------|------------|
| <b>Fencing/:</b>   |   |       |            |
| Type               | OTHER   |       |            |
| Comment:           | Ongoing issue: Inadequate fencing around open excavation.   |       |            |
| Corrective Action: | Operator shall immediately 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 inspection. | Date: | 11/07/2023 |

|                    |   |       |                 |
|--------------------|---|-------|-----------------|
| <b>Equipment:</b>  |   |       | corrective date |
| Type: Flow Line    | #   |       |                 |
| Comment:           | Ongoing issue: Multiple historically abandoned and out of service flowlines are still 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: |  |
| <b>Flaring:</b>    |  |       |  |
| Type               |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

|  |  |  |  |
|--|--|--|--|
|  |  |  |  |
|--|--|--|--|

|                      |                |               |            |                  |
|----------------------|----------------|---------------|------------|------------------|
| 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 reportingschedule. Operator will maintain quarterly reporting until the site investigation is completeand the implementation schedule can be updated.Corrective Action date back dated to thelast 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:**

Lat \_\_\_\_\_ Long \_\_\_\_\_

DWR Receipt Num: \_\_\_\_\_

Owner Name: \_\_\_\_\_

GPS : \_\_\_\_\_

**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.

Corrective Action: Install BMPs in accordance with 1002.f.(2) to prevent erosion, run-on/off into the open excavation and off location. Date: 06/06/2023

**Pits:** ☐ NO SURFACE INDICATION OF PIT

**COGCC Comments**

| Comment   | User      | Date       |
|---|-----------|------------|
| <ul style="list-style-type: none"> <li>-Remedial excavation remains open.</li> <li>-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).</li> <li>-No warning placards/signage present at excavation.</li> <li>-Signage at former tank battery has faded and is difficult to discern.</li> <li>-No signage present at location entrance.</li> <li>-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.</li> <li>-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.</li> <li>-Weeds, trash, debris and water were observed within the base of the open excavation.</li> <li>-Weeds, trash, debris were observed throughout the location.</li> <li>-Multiple uncapped/improperly capped flowlines extend into the open excavation.</li> <li>-A clay pipeline has been exposed on the southeast corner of the excavation. The pipe appears to have been damaged.</li> <li>-A buried utility line has been cut and is exposed in the northeastern corner of the excavation.</li> <li>-Two monitoring wells remain on location, a third has been has fallen into the western portion of the excavation.</li> <li>-Operator is late on quarterly reporting required by Rule 913.e.(3)</li> </ul> | 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   |
|--------------|----------------------|---|
| 403588351    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6314437">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6314437</a> |
| 710100071    | Photo Documentation  | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6314435">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6314435</a> |