

**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:

11/28/2023

Submitted Date:

11/29/2023

Document Number:

710100096

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
 _____ Anderson, Laurel _____ 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:

16 Number of Comments

10 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
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Kauffman, KPK		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240350	WELL	PR		GW	123-08138	FIRECRACKER UNIT 1	EI
317998	LOCATION	AC			-	FIRECRACKER UNIT-61N68W 12SWNW	EI
478834	Flowline System	AC	12/17/2020		-	Facility 4 North	EI
478835	Flowline System	AC			-	Facility 4 South	EI
484440	SPILL OR RELEASE	AC			-	Firecracker Tank Battery	EI

General Comment:

This is an environmental inspection for KP Kauffman (KPK):

Firecracker Unit-61N68W12SWNW Location ID: 317998

Flowline System: 478835

Firecracker Tank Battery - Spill ID: #484440

FIRECRACKER UNIT #1 Well: API# 05-123-08138

Spill Date of Discovery: May 4, 2022

As of November 29, 2023, the spill has been open 574 days.

ECMC performed an inspection on October 31st and November 28th, 2023.

Any corrective actions from previous inspections and comments/COAs from previously denied/approved forms that have not been addressed remain applicable.

Photos are attached to document site conditions.

Excavation extent and/or stockpiled soil/E&P waste are located:

<300' from surface water and wetlands

Visibly stained soil extends to property boundary and associated fenceline to the north.

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	No warning/hazard placards present at open excavations.		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Wellhead signage is faded.		
Corrective Action:	Install sign to comply with Rule 605.g.	Date:	07/05/2023

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:			
Corrective Action:		Date:	
Type	OTHER		
Comment:	Stained soil/trash/debris/unused equipment. Stained soil has been tracked throughout the location and off location. Trash, torn/damaged construction fencing were observed on location. Unused corroded flowlines were are stored on location without BMPs.		
Corrective Action:	Comply with Rules 606., 902.c., and 1002.f.(2)D.	Date:	06/19/2023

Overall Good: ☐

Spills:			
Type	Area	Volume	
PW/CO		>= 5 bbls	
Comment:	Remediation of the spill is ongoing. Visibly impacted soil remains in situ throughout the base and sidewalls of the current excavation extent. Operator is past due on reporting. Spill remains open. No Form 27's have been received and no Form 19 has been received since May 17, 2023. Operator is out of compliance with Rule 912.b.(6).		
Corrective Action:	Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.		Date: 08/02/2023

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Fencing/:			
Type	OTHER		

Comment:	Excavation fencing is comprised of metal cattle fencing. A portion of the fence on the East side has begun to fall and requires repair. No Operator personnel were on location at the time of inspection. Signs of livestock were observed throughout the location (see attached photo documentation).		
Corrective Action:	Operator shall immediately install, repair and maintain BMPs to protect the environment, public health, safety and welfare and the environment as required by Rule 913.b.(5)B.i and ECMC Guidance 913.b.(5)B i-v Fencing used must be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, etc.	Date:	11/30/2023

Equipment:			corrective date
Type: Flow Line	#		
Comment:	Multiple flowlines of unknown status were observed exposed within the open excavation.		
Corrective Action:	Comply with COGCC 1105 series Rules for Abandonment; Repair all active flowlines intended for return to service; or Historically abandoned/ out of service flowlines exposed in the excavation must be abandoned per ECMC Rule 1105 (ends sealed per 1105.e.4). Provide confirmation documentation of completion (photos) to COGCC Integrity Inspector and Engineer.	Date:	06/19/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities

Facility ID: 240350	Type: WELL	API Number: 123-08138	Status: PR	Insp. Status: EI
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Facility ID: 317998	Type: LOCATION	API Number: -	Status: AC	Insp. Status: EI
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Facility ID: 478834	Type: Flowline	API Number: -	Status: AC	Insp. Status: EI
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Complaint

Comment: Followup ECMC Environmental Inspection in response to complaint of waste management/dumping.
See Complaint (Doc #403403126) for a detailed description of complaint.
Environmental Protection Specialist Assigned: Laurel Anderson
Location ID: 317998
Flowline System ID: 478834
Spill/Release ID: 484440
Inspections (Doc #710100023 & #710100034)

Corrective Action: Refer to location, environmental, reclamation sections and inspection photos for corrective actions and documentation of site conditions at the time of inspection.

Date:

Facility ID: 478835	Type: Flowline	API Number: -	Status: AC	Insp. Status: EI
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Facility ID: 484440	Type: SPILL OR	API Number: -	Status: AC	Insp. Status: EI
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Environmental

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Comment	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905. Impacted soil is being stockpiled on location with inadequate BMP's (liner torn and berm is not continuous). Corroded steel flowlines are stored on location without any BMPs.			
Corrective Action	Immediately remove oily waste and properly dispose in accordance with 905.e. Document removal of oily waste on Supplemental Form 19. Manage stockpiles in compliance with Rule 1002.(c). Manage waste in compliance with Rule 913.b. (3) and ECMC Guidance 913.b.(5)B.i-v.			Date: 06/06/2023

Spill/Remediation:

Comment:	Remediation of the spill is ongoing. Water has infiltrated the open excavation. The current excavation extent and E&P waste stored on location are in close proximity to wetlands and surface water.			
Corrective Action:	Operator shall provide 48 hour notice to ECMC Area Environmental Protection Specialist prior to any sampling, excavation, backfill or soil boring/monitoring well installation on location. In accordance with 913.d.(1) Operator will investigate impacts to soil, groundwater and surface water as soon as the impacts are discovered. Additionally, pursuant to Rule 902.c., Operator will prevent the unauthorized discharge or disposal of oil, condensate, gas, E&P Waste, Chemical substances, trash, discarded equipment, and other oil field waste.			Date: 06/06/2023

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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment _____

Operator has created an excessive footprint and formed an additional access road across the property adjacent to the tank battery.

Corrective Action _____

Operator shall comply with ECOM 1102.e. Rules for Surface disturbance minimization.

Date 12/13/2023

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 REVEGETATIONCropland

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: _____

Corrective Action: _____ Date _____

Overall Final Reclamation _____ Well Release on Active Location ☐ Multi-Well Location ☐

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: Remedial excavation is open. Water (partially frozen) was observed within the open excavation at the time of inspection. No stormwater BMPs have been installed on location to prevent run-on/off into the open excavations and off location.</p> <p>Corrective Action: Operator shall install BMPs in accordance with 1002.f.(2) to prevent erosion, run-on/off into the open excavation and off location.</p> <p>Date: 06/12/2023</p>						
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

Attached Documents

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

Document Num	Description	URL
710100097	October 31, 2023 Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338263
710100098	November 28, 2023 Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338265