

**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:

710100099

**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:**

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

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240510	WELL	SI		GW	123-08298	GUADAGNOLI 1	EI
318053	LOCATION	AC			-	GUADAGNOLI-62N67W 30SWSW	EI
479608	Flowline System	AC	03/12/2021		-	Facility 4 Consolidation	EI
484039	SPILL OR RELEASE	AC			-	Guadagnoli Consolidated Flowline	EI

**General Comment:**

This is an ECMC Environmental Field Inspection to determine progress on Spill ID 484039.

Any corrective actions from previous inspections that have not been addressed remain applicable. Any unaddressed COAs from previously approved forms remain 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: A Representative with the Town of Frederick contacted ECMC stating: "During monitoring well installation] we found some contaminated soil roughly 15ft in depth. The location of the groundwater monitoring well is in 2N 30S 67W at 40.102367, -104.941582" The monitoring well was reportedly installed during the week of March 6th, 2023. On March 16th, 2023, COGCC notified the Operator, KP Kauffman (KPK), of the suspected release and requested a Form 19 Spill/Release Report be submitted. KPK submitted Form 19is (Doc #403349253) on March 17, 2023.

Reported Spill Discovery Date: 3/16/2023

Days open: 258

Last report date: 3/17/2023

Location				
<b>Lease Road:</b>				
Type				
comment:	Lease road is in poor condition and significantly rutted.			
Corrective ActionL				Date:
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:				
Corrective Action:				Date: _____
<b>Good Housekeeping:</b>				
Type	WEEDS			
Comment:	Weeds observed throughout entire location.			
Corrective Action:	606.c. weeds - Oil and Gas Locations will be kept free of all Undesirable Plant Species.			Date: 12/13/2023
Type	TRASH			
Comment:	Trash and rubbish observed throughout location.			
Corrective Action:	606.d. trash - Operators will properly dispose of all trash, rubbish, and other waste materials as non-hazardous/non-E&P solid waste, pursuant to Rule 906.c.			Date: 12/13/2023
Overall Good: <input type="checkbox"/>				
<b>Spills:</b>				
Type	Area	Volume		
Comment:	Stained soil, leaky and improperly maintained equipment observed throughout location. Rule 1002.f.(2)D. Self-inspection, maintenance, and good housekeeping procedures and schedules to facilitate identification of conditions that could cause breakdowns or failures of BMPs. These procedures shall include measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal practices. In conducting inspections and maintenance relative to stormwater runoff, operators shall consider seasonal factors, such as winter snow cover and spring runoff from snowmelt, to ensure site conditions and controls are adequate and in place to effectively manage stormwater.			
Corrective Action:	Conduct maintenance and repairs on equipment, cleanup stained material and review self inspection processes per Rule 1002.f.(2).D.			Date: 12/06/2023
In Containment: Yes				
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				
<b>Fencing/:</b>				
Type	OTHER			
Comment:	Fencing for tanks and separators is in disrepair and were open at the time of inspection. Access road gate was open at the time of inspection.			
Corrective Action:				Date:
<b>Equipment:</b>				
Type: Vertical Separator	#			corrective date
Comment:	Leaky equipment within separator shed.			
Corrective Action:	Operator shall properly handle, transport and dispose of oily waste in accordance with 905.e. See Good Housekeeping section for additional corrective actions required.			Date: 12/06/2023

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		,
Comment: <b>Stained soil observed around crude oil AST.</b>					
Corrective Action: <b>Control and contain spills/releases and clean up per Rule 912.a. If the spill/release does not meet the reporting requirements of Rule 912.b., then Operator shall document cleanup efforts and provide documentation of the cleanup to Area EPS. If the spill/release meets the reporting requirements of Rule 912.b., then Operator shall report the spill/release of E&amp;P waste and contact ECMC EPS staff per Rule 912.b.</b>					Date: <b>11/30/2023</b>

**Paint**

Condition	Adequate
Other (Content)	
Other (Capacity)	
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth					
Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	<50 BBLs	PBV CONCRETE		,
Comment: <b>Partially buried concrete produced water vessel is in disrepair. Access to the tank is open with no netting to protect wildlife.</b>					
Corrective Action: <b>Install wildlife protection equipment per Rule 608.a.(13). See Good Housekeeping section for additional corrective actions required.</b>					Date: <b>12/06/2023</b>

**Paint**

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth				
Comment:				
Corrective Action:				Date:

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities									
Facility ID:	<u>240510</u>	Type:	<u>WELL</u>	API Number:	<u>123-08298</u>	Status:	<u>SI</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>318053</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>479608</u>	Type:	<u>Flowline</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>484039</u>	Type:	<u>SPILL OR</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>

**Environmental****Spills/Releases:**

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

Comment: Operator is out of compliance with Rule 912.b. ECMC has not received a Supplemental Form 19 nor a Form 27 for Spill ID #484039. As of 11/29/2023 the spill has been open 258 days. Last report received on: 3/17/2023

Corrective Action: Pursuant to Rule 912.b.(6), no later than 90 days after a Spill or Release is discovered, Operators are required to have submitted, and obtained the Directors approval of either: A. A Form 19 Supplemental 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 B. 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: 06/14/2023

Reportable: YES 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: \_\_\_\_\_

**Spill/Remediation:**

Comment: As of 11/29/2023 Spill ID #484039 has been open for 258 days - No site investigation/remediation has been reported to date.

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, groundwater and surface water as soon as the impacts are discovered.

Date: 03/16/2023

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

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

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

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

Document Num	Description	URL
710100100	Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338270">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338270</a>