

**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&amp;P waste are located:

&lt;300' from surface water and wetlands

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

**Location**Overall Good: ☐

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

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

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 stored on location without BMPs.		
Corrective Action:	Comply with Rules 606., 902.c., and 1002.f.(2)D.	Date:	06/19/2023
Type	WEEDS		
Comment:			
Corrective Action:		Date:	

Overall Good: ☐

<b>Spills:</b>			
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?

<b>Fencing/:</b>			
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

<b>Equipment:</b>			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

<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:		Date:	

<b>Flaring:</b>			
Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: <u>240350</u>	Type: <u>WELL</u>	API Number: <u>123-08138</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
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Facility ID: <u>317998</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
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Facility ID: <u>478834</u>	Type: <u>Flowline</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
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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: <u>478835</u>	Type: <u>Flowline</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
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Facility ID: <u>484440</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
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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  
SEGREGATION \_\_\_\_\_

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 ECMC 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 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: \_\_\_\_\_

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
403610195	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338297">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338297</a>
710100097	October 31, 2023 Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338263">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338263</a>
710100098	November 28, 2023 Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338265">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6338265</a>