

**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:

01/09/2024

Submitted Date:

01/11/2024

Document Number:

710100120**FIELD INSPECTION FORM**Loc ID 467175 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1700 LINCOLN ST STE 4550City: DENVER State: CO Zip: 80203**Status Summary:**

- ☒
- THIS IS A FOLLOW UP INSPECTION
-
- ☐
- FOLLOW UP INSPECTION REQUIRED
-
- ☐
- NO FOLLOW UP INSPECTION REQUIRED

Findings:7 Number of Comments1 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.
Kauffman, KPK		cogcc@kpk.com	All Inspections
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Graber, Nikki		nikki.graber@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 projects;
All unaddressed CAs from previous inspections, COAs from approved forms and comments from denied forms still apply.

Overview: 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.

ECMC performed inspection on January 9th, 2024.

No crews were onsite.

Photos are attached to document site conditions.

Inspected Facilities						
Facility ID:	467173	Type:	TANK	API Number: -	Status: AC	Insp. Status: EI
Facility ID:	476532	Type:	SPILL OR	API Number: -	Status: CL	Insp. Status: EI

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Remediation excavation remains open. Excavation backfill was approved 11/16/2023 to address the ongoing threat to public health and safety at this location (document no1561587).

Corrective Action: Operator shall provide 48 hour notice to area EPS and Nikki Graber (nikki.graber@state.co.us) prior to backfill.

Date: _____

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: _____

COGCC Comments

Comment	User	Date
<p>-Horizontal separator, ECD and (2) crude oil ASTs have been removed, associated on-location piping and earthen secondary containment berm remain on location.</p> <p>-Remedial excavation remains open.</p> <p>-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).</p> <p>-No warning placards/signage present at excavation.</p> <p>-Signage at former tank battery has faded and is difficult to discern.</p> <p>-No signage present at location entrance.</p> <p>-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.</p> <p>-Excavation fencing installed remains inadequate - (torn, sagging, large gaps between fencing and ground, installed close to unstable sidewalls, etc.). 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.</p> <p>-Animal prints were observed within the base of the excavation.</p> <p>-Weeds, trash, debris and water were observed within the base of the open excavation.</p> <p>-Weeds, trash, debris were observed throughout the location.</p> <p>-Multiple uncapped/improperly capped flowlines extend into the open excavation.</p> <p>-A clay pipeline has been exposed on the southeast corner of the excavation. The pipe appears to have been damaged.</p> <p>-A buried utility line has been cut and is exposed in the northeastern corner of the excavation.</p> <p>-Two monitoring wells remain on location, a third has been has fallen into the western portion of the excavation.</p> <p>-Operator is late on quarterly reporting required by Rule 913.e.(3)</p>	andersoln	01/11/2024

Attached Documents

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

Document Num	Description	URL
710100121	Photo Documentation	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390065

