

**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:

710100118

FIELD INSPECTION FORM

Loc ID 318400 Inspector Name: Anderson, Laurel On-Site Inspection 2A Doc Num: _____

Status Summary:

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

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

Findings:

- 13 Number of Comments
- 6 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.
Graber, Nikki		nikki.graber@state.co.us	
Bickford, Fred		fdbickford@comcast.net	527 LLC - Landowner
Wilson, Mike		acekittykittym@yahoo.com	527 LLC - Landowner Representative
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Kauffman, KP		cogcc@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
241230	WELL	SI	08/01/2023	OW	123-09018	UPRR 43 PAN AM B 7	EI
318400	LOCATION	AC	08/01/2023		-	UPRR 43 PAN AM B-61N68W 3NWNW	EI
484038	SPILL OR RELEASE	AC	03/20/2023		-	Facility 1 Historical	EI

General Comment:

On January 9th, 2024, ECMC Environmental Protection Specialist, Laurel Anderson, met KP Kauffman personnel on location to witness soil boring and monitoring well installation and perform an environmental inspection.

Spill ID No: 484038
Remediation Project No: 31902
Location ID No: 318400
UPRR 43 PAN AM B7 Well - API No: 123-09018

Any corrective actions from previous inspections, comments/conditions of approval from previously denied/approved forms that have not been addressed remain applicable. Operator personnel, Operator subcontractors, a landowner representative and their subcontractor were on location at the time of this field inspection. Photos attached to document site conditions.

Incident information: Spill Discovery Date: 3/15/2023
Days open: 302 days as of 1/11/2024
Last Form 19 received: 3/17/2023 - Operator is out of compliance with Rule 912.b.(4) and COAs applied to Form 19 Initial Document #403348902.
Last Form 27 received: 8/30/2023 - Operator is out of compliance with Rule 913.e. and COAs applied to Form 27 Initial Document 403516143.

Current site status: Multiple excavations observed during previous inspection (Doc #710100107) have been backfilled and multiple soil stock piles observed without BMPs during previous inspection (Doc #710100107) are no longer present, excavation for historic release (Spill ID 484038) has been backfilled. Operator has not submitted any Forms (Form 19/Form 27s) for Spill ID #484038 nor Remediation Project #31902 as required by Rule, conditions of approval on previously approved forms and corrective actions on previous inspections.

Impacts to soil and groundwater have been documented by a third party contractor (See Doc Nos: 1561572, 1561573, 1561584 - 1561588), impacts associated with Spill ID 484038 reportedly remain in-situ. Trash/debris/weeds and various E&P waste were observed throughout the location, visibly impacted soil was observed during soil boring installation around the former ASTs, visibly impacted soil was also observed beneath the pumpjack pad. Wellhead has been cut and capped the excavation remains open. All aboveground equipment location has been removed (pumpjack, produced water tank and crude oil ASTs, separator, risers and the meter shed).

Operator personnel were observed transporting dirt from off location and unloading the dirt near the former wellhead where crews were breaking the concrete pumpjack pad for removal at the time of inspection. ECMC Staff notified Operator Environmental personnel on location of the visibly impacted soil observed beneath the concrete pumpjack pad and required a Form 19 Initial pursuant to Rule 912.b. (1)G.

Location

Overall Good:

Emergency Contact Number:

Comment: Ongoing issue:
Sign not legible at location entrance. No other signage present.

Corrective Action: **Comply with Rule 605.g.**

Date: 12/07/2023

Good Housekeeping:

Type OTHER

Comment: Ongoing issue:
Weeds/stained soil observed throughout the location.
Trash, torn liner, construction fencing and broken pieces of fiberglass flowlines were observed on location.

Corrective Action: **Comply with Rules 606., 902.c., and 1002.f.(2)D and 1003.f.**

Date: 12/26/2023

Overall Good:

Spills:

Type	Area	Volume
PW/CO	Pump Jack	
Comment:	Visibly impacted soil was observed beneath the concrete pumpjack pad at the time of inspection. ECMC Staff notified Operator Environmental personnel on location of the visibly impacted soil observed beneath the concrete pumpjack pad and required a Form 19 Initial be submitted pursuant to Rule 912.b.(1)G.	
Corrective Action:	Operator shall report the release as required by Rule (Rule 912.b.) and as discussed with Operator personnel on location during this environmental inspection. Additionally, Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. and Operator shall provide documentation of additional party notifications as required by Rules 912.b.(7)–(10). As of 13:00 January 11, 2024, ECMC has not received a Form 19 Initial for the visibly impacted soil observed beneath the concrete pumpjack pad.	

Date: 01/10/2024

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities

Facility ID: 241230 Type: WELL API Number: 123-09018 Status: SI Insp. Status: EI

Facility ID: 318400 Type: LOCATION API Number: - Status: AC Insp. Status: EI

Facility ID: 484038 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Excavation related to Spill ID No. 484038 (documented in previous inspections Doc#689501427 and Doc #691201675) has been backfilled and associated impacted soil previously stockpiled on location has been removed). Site assessments conducted by 3rd Party contractor documents impacts to soil and groundwater discovered at this location. Last report: 3/17/2023 Operator is out of compliance with Rule 912.b.(4) and COAs applied to Form 19 Initial Document #403348902.

Corrective Action: A supplemental Form 19 was required by 3/25/2023. Date: 03/25/2023

Reportable: YES GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Spill/Remediation:

Comment: Spill ID 484038 remains open; date of discovery 3/15/2023.

Corrective Action: Per ECMC Inspection Doc #689501427: "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: 06/13/2023

Emission Control Burner (ECB): _____

Comment:

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

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: E&P waste was being repositioned and stockpiled on location without BMPs near the former wellhead at the time of inspection.

All previous corrective actions regarding E&P waste and oily stills that have not been addressed remain applicable.

Corrective Action: Operator shall properly handle, transport and dispose of E&P waste in accordance with 905.b., 905.e., 905.f. and attach all waste manifests to the next Supplemental Form 27 per Rule 905.b.(3).
 Additionally, Operator shall manage waste in compliance with Rule 913.b.iv and ECMC Guidance 913.b.(5)B i-v.
 Ongoing issue - Corrective action backdated to previous inspection (Doc #710100107).

Date: 12/05/2023

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
403652327	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390078
710100119	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390064