

**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:

01/26/2024

Submitted Date:

01/31/2024

Document Number:

710100139**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Anderson, Laurel 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:**12 Number of Comments6 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	<a href="#">All inspections.</a>
Peterson, John	303-550-8872	jpeterson@kpk.com	<a href="#">Director EHS &amp; Compliance</a>
Wold, Reed		reed.wold@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Kauffman, KPK		cogcc@kpk.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
241436	WELL	PR		GW	123-09225	PACE-CONNELLY 3	EI
241437	WELL	PR		OW	123-09226	PACE-CONNELLY 8	EI
485681	SPILL OR RELEASE	AC	12/12/2023		-	Pace-Connelly #3	EI

**General Comment:**

This is an environmental inspection of the following KP Kauffman (KPK) facilities:

[PACE-CONNELLY 3 \(Spill/Release ID #485681\)](#)[PACE-CONNELLY 3 \(API 05-123-09225\)](#)[PACE-CONNELLY 8 \(05-123-09226\)](#)[PACE-CONNELLY-62N68W27NWSE \(Location ID #318509\)](#)

Any corrective actions from previous inspections that have not been addressed are still applicable. Any comments/conditions of approval from previously denied/approved forms that have not been addressed are still applicable.

At the time of inspection no Operator personnel or subcontractors were on location.

Photos attached to document site conditions.

Location			
<b>Lease Road:</b>			
Type	Access		
comment:	Access road is rutted and requires maintainance. See Stormwater Corrective Actions		
Corrective ActionL		Date:	
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:			
Corrective Action:	Date: _____		
<b>Good Housekeeping:</b>			
Type	OTHER		
Comment:	Lack of maintenance/good housekeeping procedures.		
Corrective Action:	Comply with 1002.f.(2).D. for 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.		Date: 02/29/2024
Type	WEEDS		
Comment:	Weeds observed along access road and adjacent to tank battery.		
Corrective Action:	Comply with Rules 606.c. and 1003.f.		Date: 02/13/2024
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
Comment:	Leaky equipment and stained soil were observed at multiple locations (see attached photo documentation).		
Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a.  Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts (photo documentation and waste disposal manifests) to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR.  Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.		Date: 02/13/2024
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Fencing/:</b>			
Type	OTHER		
Comment:	Fencing for open excavation is inadequate and does not surround the entire perimeter of the excavation.		
Corrective Action:	Operator shall immediately install, repair and maintain best management practices 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 which requires fencing used be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc.		Date: 01/31/2024



Inspected Facilities									
Facility ID:	<u>241436</u>	Type:	<u>WELL</u>	API Number:	<u>123-09225</u>	Status:	<u>PR</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>241437</u>	Type:	<u>WELL</u>	API Number:	<u>123-09226</u>	Status:	<u>PR</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>485681</u>	Type:	<u>SPILL OR</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>

Environmental			
<b>Spills/Releases:</b>			
Type of Spill: _____		Estimated Spill Volume: _____	
Comment:	Pace-Connelly #3 (Spill ID #485681) is open. Stained soil was observed along the sidewall of the open excavation.		
Corrective Action:	Per comment on Denied Form 19s (Doc #403647506): "ECMC has denied this form for the following reasons, Operator is out of compliance with reporting requirements and COAs and is directed to submit a replacement form immediately." Doc #403647506 was denied on 1/8/2024. Operator has not submitted a replacement form as of 1/30/2024. Operator shall submit a replacement Form 19s immediately.		Date: 01/08/2024
Reportable: YES	GPS: Lat _____	Long _____	
Proximity to Surface Water: _____		Depth to Ground Water: _____	
<b>Water Well Complaint:</b>			
DWR Receipt Num: _____	Owner Name: _____	GPS : _____	Lat _____ Long _____
<b>Field Parameters:</b>			
Sample Location: _____		Comment: _____	

**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:		This location does not comply with Rule 1002.f. During this inspection, Staff observed evidence of erosion from unpaved areas (including the access road and tank battery) resulting in sediment transport offsite. See attached photo documentation.				
Corrective Action:		Comply with Rule 1002.f.				Date: 02/13/2024
<b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

**COGCC Comments**

Comment	User	Date
Per Rule 1002.f., oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices.	andersoln	01/30/2024

**Attached Documents**

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

Document Num	Description	URL
710100140	Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6414521">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6414521</a>