

**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:

02/29/2024

Submitted Date:

03/06/2024

Document Number:

710100162

FIELD INSPECTION FORM

Loc ID _____ 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
- 9 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
Kirschner, Steven		steven.kirschner@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	All Inspections
Wold, Reed		reed.wold@state.co.us	
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240691	WELL	PR		GW	123-08479	JOHNSON 1	PR
318137	LOCATION	AC			-	JOHNSON-62N68W 26SWSE	EI
446467	LOCATION	AC			-	JOHNSON	EI
446598	TANK BATTERY	AC			-	JOHNSON	EI
475954	OFF- LOCATION FLOWLINE	AC	01/12/2021		-	Wellhead Line	EI
475955	OFF- LOCATION FLOWLINE	AC	01/12/2021		-	Wellhead Line	EI
485936	SPILL OR RELEASE	AC			-	Johnson 1 Flowline	EI

General Comment:

Combined Environmental inspections were conducted February 29th and March 1st, 2024, by ECMC Environmental Protection Specialists Laurel Anderson and Kari Brown, to document ongoing remediation activities at the Johnson 1 Flowline Spill (Spill ID #485936) and following facilities:

Location ID No: 446467 (Johnson)

Location ID No: 318137 (JOHNSON-62N68W26SWSE)

Facility ID No: 446598 (Johnson Tank Battery)

Johnson 1 Well API: 05-123-08479

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.

No Operator or contract personnel were on location at the time of either inspection. No identifiable changes were made between the 2/29/2024 and 3/1/2024 inspections. Photos attached to document site conditions.

Excavation extent is:

Within a 100 year floodplain

Within the Town of Frederick

<10' from a walking path

<25' from Godding Hollow stream

<20' from wetland

~400' from an occupied structure

-Orange construction fencing surrounding open excavation and contaminated soil stockpile had fallen

-Warning signage has come loose and is no longer attached to orange construction fencing

-Contaminated soil stockpile BMPs are inadequate and impacted soils have spread and been tracked outside of containment and the work area

-Water, free product and visibly impacted soil were observed within the open excavation

-Trash and debris were observed throughout the location and within the open excavation

-Weeds were observed throughout the location

-Wattles on location are degraded and starting to fall apart

-Dirt has been tracked onto the adjacent paved walking path

-Wellhead signage is faded and illegible

-A white crust is visible throughout the location

Location			
Lease Road:			
Type	Other		
comment:	Ongoing issue: Trackout observed on adjacent paved trail.		
Corrective Action:	<p style="color: red; font-size: small;">Per CA on Field Inspection Report Document #710100146: "Operator shall immediately remove material tracked onto the public trail. Additionally, Operator shall implement or modify BMPs to prevent tracking of material offsite/onto public trails. Operator shall comply with Rule 1002.f." Compliance with Rule 1002.f. and continuous monitoring and maintenance of BMPs was required by February 5, 2024. ECMC observed the Operator out of compliance on February 29th and March 1st, 2024. CA due backdated to FIR Doc #710100146 when issue was first observed.</p>		Date: <u>02/05/2024</u>
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	WELLHEAD		
Comment:	Ongoing issue: Wellhead signage faded and not legible.		
Corrective Action:	<p style="color: red; font-size: small;">Per CA on Field Inspection Report Document # 710100146: "Install sign to comply with Rule 605.d. and 605.g." Compliance with Rules 605.d. and 605.g. was required by February 19th, 2024. ECMC observed the Operator out of compliance on February 29th and March 1st, 2024. CA due backdated to FIR Doc #710100146 when issue was first observed.</p>		Date: <u>02/19/2024</u>
Emergency Contact Number:			
Comment:			Date: _____
Corrective Action:			
Good Housekeeping:			
Type	OTHER		
Comment:	Ongoing issue: Trash and debris onsite.		
Corrective Action:	<p style="color: red; font-size: small;">Per CA on Field Inspection Report Document # 710100146: Comply with Rule 606." Compliance with Rules 606. was required by February 12th, 2024. ECMC observed the Operator out of compliance on February 29th and March 1st, 2024. CA due backdated to FIR Doc #710100146 when issue was first observed.</p>		Date: <u>02/12/2024</u>
Type	WEEDS		
Comment:	Ongoing issue: Weeds present throughout entire location.		
Corrective Action:	<p style="color: red; font-size: small;">Per CA on FIR Doc #710100146: "Comply with Rules 606.c. and 1003.f." Compliance with Rules 606.c. and 1003.f. was required by February 19th, 2024. ECMC observed the Operator out of compliance on February 29th and March 1st, 2024. CA due backdated to FIR Doc #710100146 when issue was first observed.</p>		Date: <u>02/19/2024</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		

<p>Comment:</p>	<p>Orange construction fencing surrounding open excavation and contaminated soil stockpile has fallen. Warning signage has come loose and is no longer attached to the construction fencing.</p> <p>Per CA on Field Inspection Report Document # 710100146: "Operator shall continuously monitor 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. when sites are not attended. Operator shall continuously monitor and maintain fencing around the entire spill area."</p>		
<p>Corrective Action:</p>	<p>Compliance with Rule 913.b.(5)B.i. and ECMC Guidance 913.b.(5)B. i.-v. and continuous monitoring and maintenance of BMPs was required on February 5, 2024. ECMC observed the Operator out of compliance on February 12th, 2024, and gave the Operator 1 week (CA Due Date: February 19th) to correct the issue. ECMC observed the Operator out of compliance again on February 29th and March 1st, 2024. CA due date back dated to CA due date on FIR Doc #697602258.</p>	<p>Date:</p>	<p><u>02/19/2024</u></p>

Venting:

<p>Yes/No</p>			
<p>Comment:</p>			
<p>Corrective Action:</p>		<p>Date:</p>	

Flaring:

<p>Type</p>			
<p>Comment:</p>			
<p>Corrective Action:</p>		<p>Date:</p>	

Inspected Facilities

Facility ID: <u>240691</u>	Type: <u>WELL</u>	API Number: <u>123-08479</u>	Status: <u>PR</u>	Insp. Status: <u>PR</u>
Facility ID: <u>318137</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>446467</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>446598</u>	Type: <u>TANK</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>475954</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>475955</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>485936</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: Spill excavation extent is: <25' from Godding Hollow stream and <20' from wetland.

Corrective Action: Per CA on Field Inspection Report Document # 710100146: "Per Rule 912.b.(10) at the same time the Operator submits a Form 19i Operators are required to provide written and/or verbal notification to CPW if the Spill or Release occurred within 300 feet of surface Waters of the State. Operator has not indicated CPW has been notified. Operator shall notify CPW immediately and provide the correspondence on the subsequent Supplemental Form 19."The spill date of discovery was 1/23/2024. Compliance with Rule Rule 912.b.(10) was required by February 5, 2024. ECMC has not received documentation of consultation with CPW to date. Date: _____

Reportable: _____ 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: _____

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)
Oily Soil			
Comment	Oily waste remains stockpiled on location. Majority of oily waste removed by 1/30/2024 PM. The stickpile liner and some oily soil remain on location. The liner and perimeter berm surrounding the stockpile has been driven over and oily waste has spilled and spread outside of the lined area and further spread/tracked outside the fenced area by vehicles and snowmelt. A second soil stockpile of unknown origin was previously observed east of the spill area with no BMPs.		
Corrective Action	Per CA on FIR Doc #710100146: "Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts to the next Supplemental Form 19 per Rule 905.b.(3). Additionally, Operator shall manage waste in compliance with Rule 913.b.(5)B and ECMC Guidance 913.b.(5)B i-v. Operator shall provide photo documentation of stockpile liner integrity via Form 19 or Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil has spilled outside containment Full Table 915-1 Contaminants of Concern." Compliance with Rule 905.e. and Rule 913.b.(5).B.i.-v. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 12th, 2024 and gave the Operator 4 days to correct the issue (FIR Doc #697602258). ECMC observed the Operator remained out of compliance on February 29th and March 1st, 2024. CA due date back dated to CA due date on FIR Doc #697602258.		Date: <u>02/12/2024</u>

Spill/Remediation:

Comment: An oily sheen on snowmelt and stained soil have been observed outside of the excavation. Visibly impacted soil remains insitu and stockpiled on location with inadequate BMPs. A sheen and free product were observed on water within the open excavation.

Corrective Action: Per CA on FIR Doc #710100146: "In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered." Date: _____
Per CA on FIR Doc #697602258: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered."

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: Spill excavation extent is: <25' from Godding Hollow stream and <20' from wetland. An oily sheen on snowmelt and stained soil have been observed outside of the excavation. Impacts have spread beyond the fenced work area via runoff and trackout.
 BMPs in place to control stormwater run-on and runoff are inadequate.

Corrective Action: Per CA on Field Inspection Report Document # 710100146: "Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Install BMPs in accordance with 1002.f.(2) to prevent runoff and runoff and completely contain impacts."
 Compliance with Rule 1002.f.(2) and continuous monitoring and maintenance of BMPs was required by February 6th, 2024. ECMC observed the Operator out of compliance on February 12th and 29th and March 1st, 2024.
 CA due date backdated to FIR Doc #710100146 when the issue was first observed.

Date: 02/06/2024

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
710100163	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6457448