

**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:

710100164**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:**13 Number of Comments7 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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Brown, Kari		kari.oakman@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478831	Flowline System	AC	12/17/2020		-	Facility 1	EI
485939	SPILL OR RELEASE	AC			-	Pan Am B 4,6,10,12	EI

**General Comment:**

Combined Environmental inspections conducted February 29th and March 1st, 2024, by ECMC Environmental Protection Specialists Laurel Anderson and Kari Brown, to document ongoing remediation activities at the Pan Am B 4,6,10,12 Spill (Spill ID 485939).

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.

- Multiple open excavations were observed on location.
- Operator has disturbed an excessive amount of surface area (nearly 1 acre) including top soil and adjacent agricultural land.
- Orange construction fencing around the main excavation has fallen.
- Fencing has not been installed around additional excavations on location.
- Free product was observed on groundwater within the open excavation.
- Contaminated soil stockpile BMPs are inadequate and impacted soils have spread and been tracked outside of containment and the work area.
- Additional soil has been stockpiled on location in multiple areas.
- Gray stained soil has been stockpiled on location, within/adjacent to wetlands and surface water.
- Water, free product and visibly impacted soil were observed within the open excavation.
- Trash, glass and debris were observed scattered throughout the location and within the open excavation.
- Weeds were observed throughout the location and within the open excavation.
- An assortment of flowlines of varying material (extremely corroded steel, HDP, fiberglass, HDP in corroded steel, etc) have been removed and stored on location without any BMPs.
- Multiple uncapped flowlines are exposed within the open excavation

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: No Operator or emergency contact number posted.

Corrective Action:

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

**Good Housekeeping:**

Type	TRASH		
Comment:	Trash and debris observed throughout the location.		
Corrective Action:	Operator shall comply with 606.d. by March 14, 2024.		Date: 03/14/2024
Type	WEEDS		
Comment:	Weeds observed throughout work area and within open excavations.		
Corrective Action:	Operator shall comply with Rules 606.c. and 1003.f. by March 14, 2024.		Date: 03/14/2024
Type	STORAGE OF SUPL		
Comment:	An assortment of used equipment including valve cans and flowlines of varying material (extremely corroded steel, HDP, fiberglass, HDP in corroded steel, etc) have been removed and stored on location without any BMPs.		
Corrective Action:	Per CA on FIR Doc #697602265: "Comply with Rule 606." Compliance with Rule 606 was required by February 19, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th and March 1st, 2024. CA due date back dated to CA due date on FIR Doc #697602265 when issue was first observed.		Date: 02/19/2024

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: Operator is working within/adjacent to jurisdictional Wetlands as mapped on the National Wetland Inventory Maps. In the event that operations encroach upon the wetlands, Operator shall consult with the US Army Corps of Engineers regarding compliance with Sections 401 and 404 of the Clean Water Act. Operator shall submit all communications/permits obtained to the ECMC via Form 4 Sundry.

☐ Multiple Spills and Releases?**Fencing/:**

Type	OTHER		
Comment:	Multiple open excavation are present at this spill site. Fencing around the primary excavation has fallen and is not longer adequate. Fencing has not been installed around the other open excavations. No Operator personnel were on location at the time of inspection.		
Corrective Action:	Per CA on FIR Doc #710100144: "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."  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 29th and March 1st, 2024.  CA due date backdated to CA on FIR Doc #710100144.		Date: 02/05/2024

**Equipment:**

Type: Flow Line	#		corrective date
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Comment:	Multiple uncapped flowlines are exposed within the open excavation. ECMC Integrity Inspector has been included on this inspection.		
Corrective Action:		Date:	
<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:		Date:	
<b>Flaring:</b>			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	478831	Type:	Flowline	API Number:	-	Status:	AC	Insp. Status:	EI
Facility ID:	485939	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI

**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: GPS coordinates provided for the spill plot <100' from surface water, <100' from a freshwater emergent wetland, and ~100' from a riverine wetland. Remediation activities have extended beyond the original footprint of the spill and into/directly adjacent to wetlands and mapped surface water.

Corrective Action: Per CA on FIR Doc #710100144: "Per Rule 912.b.(10) at the same time the Operator submits a Form 19i Operator's 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 date of discovery was 1/24/2024. Compliance with Rule 912.b.(10) was required by February 5, 2024. ECMC has not received documentation of consultation with CPW to date. CA due date open - Operator shall provide the required information on the subsequent Supplemental Form 19 as required by CA on FIR Doc #710100144.

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)

Type	Management	Condition	GPS (Lat)	(Long)
		Inadequate		
Comment	Visibly impacted soil remains insitu and stockpiled on location with missing/inadequate inadequate BMPs. Impacted soils have been transported and tracked outside of containment and the work area. A sheen and free product were observed on water within the open excavation. Other E&P waste (flowlines removed) are being stored on location without any BMPs. Additionally, an excessive amount of surface area (nearly 1 acre) including adjacent agricultural land has been disturbed by site investigation and remediation activities. Remediation activities are not being conducted in accordance with Rules 905.e. and 913.b.(5).B.i.-iv.			

Corrective Action Per CA on FIR Doc #710100144: "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 i-v 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."

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 #697602265). 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 #697602265.

Date: 02/16/2024

**Spill/Remediation:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

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:		Multiple soil piles were observed on location. Visibly impacted soil is being stockpiled on a liner adjacent to mapped wetlands and surface water. Additional soil piles are stockpiled without any BMPs adjacent to and in close proximity to mapped wetlands and surface water.				
Corrective Action:		Per CA on FIR Doc #710100144: "Operator shall install and maintain BMPs in accordance with 1002.f.(2). BMPs must prevent runoff and completely contain impacts from the spill footprint and remedial activities in order to minimize contact with stormwater and precipitation." Compliance with Rule 1002.f.(2) was required by February 6, 2024. ECMC observed the Operator out of compliance on February 12th, February 29th and March 1st, 2024. CA due date back dated to CA due date on FIR Doc #710100144.				Date: 02/06/2024
Pits: <input type="checkbox"/> 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
710100165	Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6457449">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6457449</a>