

**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:

02/09/2024

Submitted Date:

03/12/2024

Document Number:

710100172**FIELD INSPECTION FORM**Loc ID 318666 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:**10 Number of Comments3 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>
Graber, Nikki		nikki.graber@state.co.us	
Kauffman, KPK		cogcc@kpk.com	<a href="#">All Inspections</a>
Peterson, John	303-550-8872	jpeterson@kpk.com	<a href="#">Director EHS &amp; Compliance</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478347	TANK BATTERY	AC	10/14/2020		-	Julian Pluss	EI
478349	OFF-LOCATION FLOWLINE	AC	10/14/2020		-	Wellhead Line 4NWNW	EI
485896	SPILL OR RELEASE	AC	02/12/2024		-	Julian Pluss #1 Tank Battery	EI

**General Comment:**

This is an environmental inspection. On February 9, 2024, ECMC inspectors met Operator representatives to witness confirmation soil sampling and document remediation progress at the Julian Pluss #1 Tank Battery Spill (Spill ID 485896).

Any corrective actions from previous inspections that have not been addressed are still applicable. Photos attached to document site conditions.

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.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		

In Containment: No

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

Type	OTHER		
Comment:	Orange construction fencing has been installed around the open excavation. Operator personnel were on location at the time of inspection.		
Corrective Action:			Date:

**Equipment:**

Type: Horizontal Separator	#		corrective date
Comment:	Horizontal separator has been removed and set aside to allow for remedial excavation.		
Corrective Action:			Date:

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS	
CONDENSATE	2	300 BBLS	STEEL AST		,	
Comment:	Two 300 BBL condensate tanks.					
Corrective Action:						Date:

**Paint**

Condition		
Other (Content)		
Other (Capacity)		
Other (Type)		

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Earthen secondary containment is not sufficiently impervious to contain spilled or released materials. Animal burrows present throughout.			
Corrective Action:	Comply with Rules 902.a., 902.b. and 902.c. Operators shall maintain earthen secondary containment berms to prevent pollution, adverse environmental impacts and the potential for unauthorized discharge of oil, condensate, gas, and/or other E&P Waste.			Date: 03/26/2024

**Venting:**

Yes/No		
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Comment:			
Corrective Action:		Date:	
<b>Flaring:</b>			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities								
Facility ID:	478347	Type:	TANK	API Number: -	Status:	AC	Insp. Status:	EI
Facility ID:	478349	Type:	OFF-	API Number: -	Status:	AC	Insp. Status:	EI
Facility ID:	485896	Type:	SPILL OR	API Number: -	Status:	AC	Insp. Status:	EI

**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Piles	Inadequate		
Comment:	Oily soil has been stockpiled on location on a liner with a perimeter berm surrounding the stockpile; however, the eastern edge of the berm and liner has been driven over and oily soil has been spilled/tracked outside the lined area.			
Corrective Action:	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.			Date: 03/26/2024

**Spill/Remediation:**

Comment:	Spill ID #485896 was discovered on 1/18/2024 and remains open.			
Corrective Action:	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. Closure of this spill is due by April 17, 2024.			Date: 04/17/2024

Emission Control Burner (ECB): \_\_\_\_\_

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

Pilot: \_\_\_\_\_

Wildlife Protection Devices (fired vessels): \_\_\_\_\_

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

Document Num	Description	URL
710100173	Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6463531">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6463531</a>