

**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: 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
- 7 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: <input type="checkbox"/>			
Emergency Contact Number:			
Comment: No Operator or emergency contact number posted.		Date: _____	
Corrective Action: 			
Good Housekeeping:			
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:	<u>02/19/2024</u>
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:	<u>03/14/2024</u>
Type	TRASH		
Comment:	Trash and debris observed throughout the location.		
Corrective Action:	Operator shall comply with 606.d. by March 14, 2024.	Date:	<u>03/14/2024</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
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.		
<input type="checkbox"/> 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:	<u>02/05/2024</u>
Equipment:			corrective date
Type: Flow Line	#		

Comment:	Multiple uncapped flowlines are exposed within the open excavation. ECMC Integrity Inspector has been included on this inspection.		
Corrective Action:		Date:	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

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 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)	
		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."			Date:	02/16/2024
	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.				

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: 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
403712038	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6457451
710100165	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6457449