

**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:

04/03/2024

Submitted Date:

04/19/2024

Document Number:

710100190

FIELD INSPECTION FORMLoc ID 318207 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 46290

Name of Operator: KP KAUFFMAN COMPANY INC

Address: 1700 LINCOLN ST STE 4550

City: 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 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 |
|---------------------|----------------|--------------------------------|-------------------|
| MacLaren, Joe | | joe.maclaren@state.co.us | |
| Kirschner, Steven | | steven.kirschner@state.co.us | |
| Ahmadian, Alexander | | alexander.ahmadian@state.co.us | |
| Peterson, John | | jpeterson@kpk.com | KPK environmental |
| Brown, Kari | | kari.oakman@state.co.us | |
| Kauffman, KPK | | cogcc@kpk.com | All Inspections |
| Ferrin, Jeremy | | jeremy.ferrin@state.co.us | |
| Watzman, Ross | (303) 825-4822 | rwatzman@kpk.com | all inspections. |
| Graber, Nikki | | nikki.graber@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------------------|--------|-------------|------------|-----------|--------------------------|-------------|
| 240872 | WELL | PR | 04/27/1976 | OW | 123-08660 | DITLEV-SIMONSEN C 1 | PR |
| 479608 | Flowline System | AC | | | - | Facility 4 Consolidation | EI |
| 485898 | SPILL OR RELEASE | AC | 02/12/2024 | | - | Facility 4 @ Ditlev C1 | EI |

General Comment:

This is an Environmental inspection conducted on April 3, 2024, by ECMC Environmental Protection Specialist, Laurel Anderson, to document ongoing remediation activities at the Facility 4 @ Ditlev C1 Spill.

Spill ID No: 485898

Facility ID No: 479608 (Facility 4 Consolidation)

DITLEV-SIMONSEN C1 Well API: 05-123-08660

Note: IMMEDIATE CORRECTIVE ACTION IS REQUIRED. Operator shall submit a FIRR to document corrective actions.

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

No Operator or contract personnel were on location at the time of inspection.

Photos attached to document site conditions.

Note: Immediate corrective action is required to stop the further spread of E&P waste from the work area

- Operator has disturbed an excessive amount of surface area
- Operator appears to have cleaned up the site some since the previous inspection; however, corrective action is still required
- Oil stained oil absorbent mats have been blown onto adjacent field in multiple directions (as far as 300' away)
- Orange construction fencing surrounding open excavation has fallen and is inadequate
- Contaminated soil stockpile BMPs are inadequate and impacted soils have spill, spread and been further tracked outside of containment and the work area
- Contaminated soil stockpile does not have fencing or warning signage
- Pieces of torn liner were observed throughout the location (both stuck in dirt and windblown)
- 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
- Animal prints were observed in dirt around the open excavation
- Wellhead signage is faded
- Stained soil visible around wellhead
- Strong hydrocarbon odor noted
- No caution/warning signage was noted at the open excavation or contaminated soil stockpile
- Trash, weeds, debris and unused equipment were observed on location
- Oil stained soil was observed around the wellhead

Incident information: Spill Discovery Date: 1/17/2024

Spill is located within the Town of Frederick and with 1/4 mile of multiple child care facilities, residences, parks, trails, and wetlands.

Based on ECMC mapping data, the Facility 4 @ Ditlev C1 Spill is located approximately 300' from Centennial Park, approximately 350 feet from a pond, approximately 700 feet from a mapped wetland (freshwater emergent), approximately 800 feet from baseball fields, and approximately 1,200 feet from dense suburban development.

Location**Lease Road:**

| | | | |
|--------------------|--|-------|------------|
| Type | Access | | |
| comment: | Ongoing issue: Access road to the wellhead and spill is extremely difficult to traverse. | | |
| Corrective Action: | Operator shall comply with Rule 1002.e. Access roads shall be located, adequately sized, constructed, and maintained so as to reasonably control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination. ECMC observed the Operator out of compliance on February 29th, March 1st and April 3rd, 2024. CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action. | Date: | 03/29/2024 |

Overall Good: ☐**Signs/Marker:**

| | | | |
|--------------------|---|-------|------------|
| Type | WELLHEAD | | |
| Comment: | Wellhead signage faded. | | |
| Corrective Action: | Install sign to comply with Rule 605.d. | Date: | 06/19/2024 |

Emergency Contact Number:

| | | | |
|--------------------|--|-------|--|
| Comment: | | | |
| Corrective Action: | | Date: | |

Good Housekeeping:

| | | | |
|--------------------|--|-------|------------|
| Type | STORAGE OF SUPL | | |
| Comment: | Ongoing issue: Unused miscellaneous supplies/equipment is being stored on location. | | |
| Corrective Action: | Per FIR Doc #697602260: "Comply with Rule 606." Compliance with Rule 606 was required by February 21, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st and April 3rd, 2024. CA due date back dated to CA due date on FIR Doc #697602260 when issue was first noted. | Date: | 02/21/2024 |
| Type | TRASH | | |
| Comment: | Ongoing issue: Trash and debris observed on location. | | |
| Corrective Action: | Operator shall comply with 606.d. by March 14, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st and April 3rd, 2024. CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action. | Date: | 03/14/2024 |
| Type | WEEDS | | |
| Comment: | Ongoing issue: Weeds observed on location and within the open excavation. | | |
| Corrective Action: | Operator shall comply with Rules 606.c. and 1003.f. by March 14, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st and April 3rd, 2024. CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action. | Date: | 03/14/2024 |

Overall Good: ☐**Spills:**

| | | | | |
|----------|--|--------|--|--|
| Type | Area | Volume | | |
| PW/CO | WELLHEAD | | | |
| Comment: | Oil stained soil was observed around the wellhead. | | | |

| | | | |
|--------------------|---|-------|------------|
| Corrective Action: | <p>Comply with ECMC Rules:</p> <p>Operator shall immediately control and contain spills/releases and clean up per Rule 912.a.</p> <p>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.</p> <p>Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.</p> | Date: | 04/26/2024 |
|--------------------|---|-------|------------|

In Containment: No

Comment:

☐ Multiple Spills and Releases?

| | | | |
|--------------------|--|-------|------------|
| Fencing/: | | | |
| Type | OTHER | | |
| Comment: | <p>Ongoing issue: Inadequate fencing around open excavation. Fencing around open excavation has fallen. Excavation was unattended at the time of inspection. Per FIR Doc #710100133: "Orange construction fencing is not appropriate for site conditions."</p> <p>Note: Continuous monitoring and maintenance of best management practices to protect the environment, public health, safety and welfare and the environment is required.</p> | | |
| Corrective Action: | <p>Per CA on FIR Doc #710100133: "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/schools, depth of excavation, presence of ground or surface water, livestock, wind, etc.".</p> <p>Compliance with Rule 913.b.(5)B.i. and ECMC Guidance 913.b.(5)B. i.-v. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st and April 3rd, 2024.</p> <p>CA due date back dated to CA due date on FIR Doc #710100133. Immediate corrective action is required.</p> | Date: | 02/05/2024 |

Venting:

| | | | |
|--------------------|--|-------|--|
| Yes/No | | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Flaring:

| | | |
|--------------------|--|-------|
| Type | | |
| Comment: | | |
| Corrective Action: | | Date: |

Environmental**Waste Management:**

| Type | Management | Condition | GPS (Lat) | (Long) |
|-------------------|---|------------|-----------|-------------------------|
| Oily Soil | Piles | Inadequate | | |
| Comment | <p>Ongoing issue: Oily soil and absorbent mats remain stockpiled on location. The liner and perimeter berm surrounding the stockpile have 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. Oil stained absorbent mats have been blown from the stockpile onto the adjacent field. An excessive amount of surface area including the adjacent field has been disturbed by site investigation and remediation activities.</p> <p>Remediation activities are not being conducted in accordance with Rules 905.e. and 913.b.(5).B.i.-iv.</p> | | | |
| Corrective Action | <p>Per FIR Doc #697602260: "Properly treat or dispose of E&P waste in accordance with Rule 905."</p> <p>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. and install BMPs in accordance with 1002.f.(2) to prevent runoff and runoff and completely contain impacts. 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.</p> <p>Compliance with Rule Rule 905 was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, and April 3rd, 2024. Immediate corrective action is required.</p> | | | Date: <u>02/07/2024</u> |

Spill/Remediation:

| | | | |
|--------------------|---|--|-------------------------|
| Comment: | Ongoing issue: Visibly impacted soil remain in-situ in the open excavation in contact with water. Free product and an oily sheen were observed on the water. No additional remedial excavation appears to have taken place since previous inspections. | | |
| Corrective Action: | <p>Per CA on FIR Doc #710100133: "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."</p> <p>Per CA on FIR Doc #697602260: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered."</p> <p>Impacts to soil and groundwater remain insitu. CA due date backdated to due date on FIR Doc #697602260.</p> | | |
| | | | Date: <u>02/19/2024</u> |

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Attached DocumentsYou can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

| Document Num | Description | URL |
|--------------|---------------------|---|
| 710100191 | Photo Documentation | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6517166 |