

**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:

04/22/2024

Submitted Date:

04/23/2024

Document Number:

710100195**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Anderson, Laurel 2A Doc Num: _____**Operator Information:**ECMC 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:8 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
MacLaren, Joe		joe.maclaren@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Kirschner, Steven		steven.kirschner@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479608	Flowline System	AC	03/12/2021		-	Facility 4 Consolidation	EI
485940	SPILL OR RELEASE	AC			-	Facility 4 @ UPRR 43 PAN AM AE	EI

General Comment:

This is an Environmental inspection conducted on April 22, 2024, by ECMC Environmental Protection Specialist, Laurel Anderson, to document ongoing remediation activities at the Facility 4 @ UPRR 43 PAN AM AE spill.

Spill ID 485940

Facility ID No: 479608 (Facility 4 Consolidation)

Note: IMMEDIATE CORRECTIVE ACTION IS REQUIRED. Operator shall submit a FIRR to document corrective actions. ECMC contacted Operator personnel following this inspection requiring immediate corrective action to address safety concerns and requiring immediate installation of fencing adequate to restrict public access.

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.

Operator personnel were not on location at the time of inspection. Photos attached to document site conditions.

Spill is located:

Within the Town of Frederick

~60 feet from a residence within a dense suburban development

~60 feet from Ridgway Blvd.

~700 feet from UPRR 42 PAN AM AE#2 (Spill ID 480251)

~375 feet from Facility 4 AE 2 (Spill ID 481730)

-Orange construction fencing has been installed around the open excavation; however, the fencing is improperly installed, sagging and torn. Orange construction fencing is not adequate to restrict public access.

-No warning signage/Operator contact information is present at the open excavation

-No fencing or warning signage has been installed around contaminated soil stockpile

-Reportedly clean fill has been stockpiled on location north of the open excavation

-Contaminated previously stockpiled without BMPs was exposed to snowmelt and spread/ further tracked outside of the immediate work area (including near where 'clean' soil is being stored). The former contaminated soil stockpile has been removed/moved.

-Contaminated soil is currently being stockpiled NW of the open excavation on a liner with berms and filtrex wattles; however, impacted soil appears to be spilling outside containment.

-Filtrex wattles have holes and are not continuous

-Groundwater has infiltrated the excavation

-Utility line within the open excavation has been broken

LocationOverall Good: ☐

Emergency Contact Number:

Comment: No Operator contact information is present at the open excavation. No warning signage present at the open excavation/contaminated soil stockpile.

Corrective Action:

Date:

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type OTHER

Comment: Remedial excavation and contaminated soil stockpile are located within the Town of Frederick, within a residential area. Orange construction fencing installed around the open excavation is torn, sagging and inadequate. The excavation has no shoring and limited sloping/benching. Contaminated soil stockpiled on location does not have fencing or warning signage.

Corrective Action: Per CA on FIR Doc #710100170: "Operator shall implement, 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."

ECMC observed the Operator out of compliance on April 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602263 when appropriate fencing and continuous monitoring of BMPs was first required.

Date: 03/11/2024

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	479608	Type:	Flowline	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	485940	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Piles	Inadequate		
Comment:	<p>-Contaminated soil is currently being stockpiled NW of the open excavation on a liner with berms and filtrex wattles; however, impacted soil appears to be spilling outside containment. No fencing or warning signage has been installed around contaminated soil stockpile.</p> <p>-Reportedly clean fill has been stockpiled on location north of the open excavation with filtrex wattles (no liner). Contaminated previously stockpiled without BMPs was exposed to snowmelt and spread/ further tracked outside of the immediate work area (including near where 'clean' soil is being stored). The former contaminated soil stockpile has been removed/moved. Filtrex wattles on location have holes and are not continuous.</p>			
Corrective Action:	<p>Per CA on FIR Doc #710100141: "Operator is required to properly dispose of oily waste in accordance with 905.e. Operator shall attach all waste manifests to the next Supplemental Form 19 per Rule 905.b.(3)."</p> <p>Per CA on FIR Doc #697602263: "Unlined stockpiles with no signage were observed on location and need to be addressed."</p> <p>Compliance with Rule 905.e. 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 #697602263). ECMC observed the Operator remained out of compliance on February 29th, March 1st and April 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602263.</p>			Date: 02/16/2024

Spill/Remediation:

Comment:	<p>Remedial excavation is remains open.</p> <p>Remedial excavation is remains open.</p> <p>Groundwater has infiltrated the base of the open excavation. Groundwater was previously observed in contact with impacted soils.</p>		
Corrective Action:	<p>Per CA on FIR Doc #710100141: "Operator shall immediately control and contain spills/releases and clean up per Rule 912.a."</p> <p>Per CA on FIR Doc #697602263: "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>CA due date back dated to CA due date on FIR Doc #697602263.</p>		
	Date: 02/19/2024		

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
710100196	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6521410