

FORM
INSPRev
X/20State of Colorado
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

05/01/2024

Submitted Date:

05/03/2024

Document Number:

710100204

FIELD INSPECTION FORM

 Loc ID _____ Inspector Name: _____ On-Site Inspection
 _____ Anderson, Laurel _____ 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:

- 11 Number of Comments
- 5 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
Graber, Nikki		nikki.graber@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Brown, Kari		kari.oakman@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Rosenberg, Kelly		kelly.rosenberg@state.co.us	regulatory/hearings

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
242508	WELL	PR		OW	123-10299	UPRR 42 PAN AM D 2	PR
318931	LOCATION	AC			-	UPRR 42 PAN AM D-62N66W 21NWNE	EI
470886	TANK BATTERY	AC	01/15/2020		-	UPRR 42 Pan Am D 2 battery	EI
481819	SPILL OR RELEASE	AC			-	UPRR 42 D2 Tank	EI

General Comment:

This is an environmental inspection to determine progress on Spill ID 481819/Remediation Project No 23780 and witness soil sampling from the open excavation. Any corrective actions from previous inspections that have not been addressed are still applicable.

Operator personnel were on location to collect soil samples from the open excavation. Remedial excavation, E&P waste transport off-location and initial soil screening activities were not witnessed by ECMC personnel.

ECMC witnessed soil samples collected from ~3-4' BGS along the sidewalls of the open excavation and from ~6-7' bgs at the base of the excavation.

Photos attached to document site conditions.

Location			
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:			Date: _____
Corrective Action:			
Good Housekeeping:			
Type	DEBRIS		
Comment:	Trash/orn liner and debris were observed on location.		
Corrective Action:	Operator shall comply with 606.d.		Date: <u>05/10/2024</u>
Type	WEEDS		
Comment:	Ongoing Issue: Weeds were observed throughout location. Corrective action has been required for weeds on: 07/10/2023 FIR Doc #697602135 CA Due date: 07/18/2023 07/28/2023 FIR Doc #710100047 CA Due date: 07/18/2023 04/02/2024 FIR Doc #697602327 CA Due date: 04/18/2024, and during this inspection 05/01/2024 FIR Doc #710100204		
Corrective Action:	ECMC observed the Operator remaining out of compliance with Rule 606 on May 1, 2024. The corrective action due date from the previous inspection (Doc #697602327) remains.		Date: <u>04/18/2024</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Orange construct fencing has been installed around the open excavation. Crews were on location at the time of inspection. Operator shall 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.		
Corrective Action:			Date:
Equipment:			
Type: Flow Line		#	corrective date
Comment:	Ongoing issue: Flowline or transfer line has been left in place but is not connected to the west above ground storage tank (produced water AST). The storage tank has not been removed or abandoned at this location. Corrective action has been required for compliance with Rule 1105.b. on: 07/10/2023 FIR Doc #697602135 CA Due date: 07/12/2023 ECMC observed the Operator remaining out of compliance with Rule 1105.b. on: 07/28/2023 FIR Doc #710100047 CA Due date: 07/18/2023 04/02/2024 FIR Doc #697602327 CA Due date: 04/18/2024 and during this inspection (05/01/2024 FIR Doc #710100204).		

Corrective Action:	<p>Per Rule 1105.b, Upon removing a flowline or crude oil transfer line from use with the intent to abandon, an operator must immediately apply OOSLAT to the risers. OOSLAT must stay in place at all times during the process of abandoning the flowline or crude oil transfer line until the operator removes the riser.</p> <p>The corrective action due date from the previous inspection (Doc #697602135) remains.</p>	Date:	07/12/2023
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Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 242508 Type: WELL API Number: 123-10299 Status: PR Insp. Status: PR

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 318931 Type: LOCATION API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 470886 Type: TANK API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 481819 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

Spill/Remediation:

Comment: [Quarterly reporting is required for Remediation Project #23780. Operator is past due on quarterly reporting. The last approved Supplemental Form 27 was received on December 20, 2022 \(Doc # 403254096\).](#)

Corrective Action: [In accordance with Rule 913.e.\(3\), Operator will adopt and maintain a quarterly reporting schedule. Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated. This location was included in NOAV # 403447292 for violation of Rule 913.e.\(3\)](#)

Date: 03/23/2023

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: [Reportedly clean fill has been stockpiled on location east of the open excavation with filtrex wattles \(no liner\). Filtrex wattles being used have holes and have not been installed properly.](#)

Corrective Action: [Install/repair BMPs per Rule 1002.f.\(2\).](#)

Date: 05/18/2024

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
710100205	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6535373