

**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:

05/03/2024

Submitted Date:

05/06/2024

Document Number:

708201230

FIELD INSPECTION FORMLoc ID 332971 Inspector Name: Edwardson, Dylan 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:**

19 Number of Comments

16 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 |
|---------------------|--------------|--------------------------------|-------------------|
| Ahmadian, Alexander | | alexander.ahmadian@state.co.us | |
| Watzman, Ross | 303-825-4822 | rwatzman@kpk.com | |
| Hansen, Logan | | logan.hansen@state.co.us | |
| Canfield, Chris | | chris.canfield@state.co.us | |
| Graber, Nikki | | nikki.graber@state.co.us | |
| , | | cogcc@kpk.com | ALL INSPECTIONS |
| Ferrin, Jeremy | | jeremy.ferrin@state.co.us | |
| Adamczyk, Megan | | megan.adamczyk@state.co.us | |
| Peterson, John | | jpeter@kpk.com | KPK environmental |
| Arthur, Denise | | denise.arthur@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|--------------|--------|-------------|------------|-----------|-------------------------------|-------------|
| 239987 | WELL | SI | 11/01/2021 | OW | 123-07775 | HLADKY-O'GORMAN 3 | RI |
| 332971 | LOCATION | AC | | | - | HLADKY-O'GORMAN-62N66W 21NWSW | RI |
| 480225 | TANK BATTERY | AC | 06/24/2021 | | - | Hladky-OGorman&CaryWalking1 | RI |

General Comment:

This Field Inspection Report is in response to a reclamation complaint. Refer to the Complaint, Location, Environmental and Reclamation sections for additional details.

Refer to the previous Environmental Field Inspection Report (doc #697602295) conducted on 03/12/2024 for additional information and corrective actions.

Any corrective actions from previous inspections, and their associated corrective action deadlines, that have not been addressed are still applicable.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Comment from FIR (doc #697602295) "Signage is not visible at the separator due to the amount of weeds. No indication that signage exists. CA originally from inspection Document #697601979 and remains unaddressed."

It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.

Corrective Action: **Install Sign to comply with Rule 605.**

Date: 01/13/2023

Good Housekeeping:

| | | | |
|--------------------|---|-------|-------------------|
| Type | WEEDS | | |
| Comment: | <p>Comment from FIR (doc #697602295) "Weeds overgrown throughout the site. Separator is not visible due to the amount of weeds. CA originally from inspection Document #697601979 and remains unaddressed."</p> <p>It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.</p> | | |
| Corrective Action: | Comply with Rule 606. | Date: | <u>12/20/2022</u> |
| Type | TRASH | | |
| Comment: | <p>Comment from FIR (doc #697602295) "Liner that was previously under an unmarked stockpile is torn in various places throughout the site. A monitoring well on site has no cap and the bailer and string is strung out across the location. Orange fencing around the wellhead exvacation has been torn and is scattered throughout the location. CA originally from inspection Document #697602143 and remains unaddressed."</p> <p>It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.</p> | | |
| Corrective Action: | Comply with Rule 606. | Date: | <u>08/03/2023</u> |

Overall Good: ☐**Spills:**

| | | | | |
|------|------|--------|--|--|
| Type | Area | Volume | | |
|------|------|--------|--|--|

In Containment: No

Comment:

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

| | | | |
|--------------------|--|-------|-------------------|
| Type | OTHER | | |
| Comment: | <p>Comment from FIR (doc #697602295) "Fencing around the excavation of the wellhead has fallen. CA originally from inspection Document #697601979 and remains unaddressed."</p> <p>It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.</p> | | |
| Corrective Action: | The operator is to maintain best management practices to control and contain all spills/releases of E&P waste to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended. | Date: | <u>12/20/2022</u> |
| Type | OTHER | | |
| Comment: | <p>Comment from FIR (doc #697602295) "Barbed wire fencing around bermed area of the tank battery was in disarray and falling all around the tank battery. CA originally from inspection Document #697602143 and remains unaddressed."</p> <p>It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.</p> | | |

| | | | |
|--------------------|---|-------|------------|
| Corrective Action: | The operator is to maintain best management practices to control and contain all spills/releases of E&P waste to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended. | Date: | 06/28/2023 |
|--------------------|---|-------|------------|

| | | |
|-------------------|--|-----------------|
| Equipment: | | corrective date |
|-------------------|--|-----------------|

| | | |
|-----------------|---|--|
| Type: Flow Line | # | |
|-----------------|---|--|

| | | | |
|----------|--|--|--|
| Comment: | Comment from FIR (doc #697602295) "Flowline within the excavation has been taped and is not properly capped. Historically abandoned and out of service flowlines are exposed in the excavation. CA originally from inspection Document #697602143 and remains unaddressed." | | |
| | It does not appear that the corrective action has been resolved at the time of this inspection. ECMC Staff observed that the taped flowline was dripping within the open excavation during this inspection. Refer to attached inspection photos. Original Corrective Action date remains applicable. | | |

| | | | |
|--------------------|--|-------|------------|
| Corrective Action: | These flowlines must be abandoned per Rule 1105 and cut ends must be sealed per 1105.e.4 | Date: | 08/03/2023 |
|--------------------|--|-------|------------|

| | | |
|-------------|---|--|
| Type: Other | # | |
|-------------|---|--|

| | | | |
|----------|---|--|--|
| Comment: | Load out line secondary containment at tank battery has free fluid within and the hatch was not closed that the time of this inspection. Refer to attached inspection photos. | | |
|----------|---|--|--|

| | | | |
|--------------------|---|-------|------------|
| Corrective Action: | Properly dispose of oily waste in accordance with Rule 905.e. | Date: | 05/21/2024 |
|--------------------|---|-------|------------|

| | | |
|-----------------------|---|--|
| Type: Bird Protectors | # | |
|-----------------------|---|--|

| | | | |
|----------|--|--|--|
| Comment: | During this inspection, it was observed that the produced water vault, fiberglass tank and vertical steel tank battery have open pipes that are not adequately protected to exclude wildlife entry. Refer to attached inspection photos. | | |
|----------|--|--|--|

| | | | |
|--------------------|---|-------|------------|
| Corrective Action: | Install or repair wildlife protection equipment per Rule 902.b. | Date: | 05/16/2024 |
|--------------------|---|-------|------------|

Tanks and Berms:

| Contents | # | Capacity | Type | Tank ID | SE GPS | |
|--------------------|---|----------|------|---------|--------|-------|
| | | | | | | |
| Comment: | | | | | | |
| Corrective Action: | | | | | | Date: |

Paint

| | | |
|------------------|--|--|
| Condition | | |
| Other (Content) | | |
| Other (Capacity) | | |
| Other (Type) | | |

Berms

| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|--------------------|---|---------------------|---------------------|------------------|
| | | | | |
| Comment: | Comment from FIR (doc #697602295) "Earthen berm surrounding the storage tanks and produced water tank is not adequate. Weeds have grown through the berm and has compromised the integrity of the berm. CA originally from inspection Document #697602143 and remains unaddressed." | | | |
| | It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable. | | | |
| Corrective Action: | Repair or install berms or other secondary containment devices per Rule 603. | | | Date: 08/15/2023 |

Venting:

| | | |
|--------|--|--|
| Yes/No | | |
|--------|--|--|

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

| Inspected Facilities | | | | | | | | | |
|--|--|-------|----------|-------------|-----------|---------|----|---------------|----|
| Facility ID: | 239987 | Type: | WELL | API Number: | 123-07775 | Status: | SI | Insp. Status: | RI |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 | | | | | | | | | |
| Facility ID: | 332971 | Type: | LOCATION | API Number: | - | Status: | AC | Insp. Status: | RI |
| Complaint | | | | | | | | | |
| Comment: | Complaint: #403772065 Field Inspector Assigned: Dylan Edwardson Location ID: #332971 Inspection Document: #708201230 Nature of complaint: Complainant had concerns that the location has an open excavation with flowlines exposed and is being mis-managed with undesirable vegetation and noxious weeds growing throughout equipment and facilities that it is creating a management issue for adjacent crop ground. | | | | | | | | |
| Corrective Action: | Refer to Environmental, Reclamation, and Inspection Photos for Corrective Action information. | | | | | | | Date: | |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 | | | | | | | | | |
| Facility ID: | 480225 | Type: | TANK | API Number: | - | Status: | AC | Insp. Status: | RI |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 | | | | | | | | | |

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Comment from FIR (doc #697602295) "The last Form 27 Supplemental Document #403207885 was submitted on 10/27/2022. Operator has not submitted a form within the approved quarterly reporting schedule and Rule 913.e.(3); the next quarterly report was due 1/25/2023." It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.

Corrective Action: Operator shall immediately submit a Form 27 for Spill ID 480225 that includes a specific workplan and timeline to address the remaining impacts.

Date: 01/25/2023

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) |
|-------------------|--|-----------|-----------|------------------|
| Oily Soil | | | | |
| Comment | <p>Comment from FIR (doc #697602295) "Stockpile has been mostly washed away and stormwater BMPs surrounding the remaining stockpile are inadequate. The liner under the stockpile is still on location and is torn in various spots. No berm exists around the remaining stockpile. CA originally from inspection Document #697602143 and remains unaddressed."</p> <p>It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.</p> | | | |
| Corrective Action | E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905. | | | Date: 08/03/2023 |
| | | | | |
| Comment | <p>At the time of this inspection, ECMC Staff observed that one of the exposed flowlines within the open remediation excavation was actively dripping and pooling within the excavation floor. Flowline does not appear to be properly abandoned/capped to prevent E&P waste from actively discharging.</p> | | | |
| Corrective Action | Report spill or release of E&P waste or produced fluids. Remove free fluids and contact ECMC EPS staff (Chris.Canfiled@state.co.us) per Rule 912.b. 24 hours to remove free fluids. 24 hours for notification and 72 hours for Initial Form 19 Report. | | | Date: 05/07/2024 |

Spill/Remediation:

Comment: Comment from FIR (doc #697602295) "Remediation excavation is still open and has not changed since the last inspection. Weeds are overgrown within the excavation due to the length of time that the excavation has been open. Excavation is surrounded by metal fencing which is adequate. CA originally from inspection Document #697601979 and remains unaddressed."

It does not appear that the corrective action has been resolved at the time of this inspection. Original Corrective Action date remains applicable.

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.

Date: 12/20/2022

Emission Control Burner (ECB): _____

Comment: _____

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

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? FailProduction areas stabilized ? Fail

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCroplandTop soil replaced _____ Recontoured _____ Perennial forage re-established FailNon-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? F

Comment This location does not comply with Rule 1003. During this inspection, it was observed that interim areas are not progressing towards reclamation rules and standards with evidence of undesirable vegetation throughout including but not limited to - curly dock and kochia. Several CO List B Noxious Weed species were also identified during this inspection including - russian olive, hoary cress and canada thistle. It is also apparent that equipment not needed for production operations (e.g. trailers, tanks, etc) is being stored on location in close proximity to meter runs and flowline risers. Additional reclamation activities area required for this location. Refer to attached inspection photos.

Corrective Action Perform reclamation in accordance to Rule 1003.Date 05/21/2024Overall Interim Reclamation Fail**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads _____ Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

| | | |
|---------------------------|---------------------------------|---------------------|
| Comment: | | Date |
| Corrective Action: | | |
| Overall Final Reclamation | Well Release on Active Location | Multi-Well Location |

Storm Water:

| | | | | | | |
|---|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
| | | | | | | |
| <div>Comment: This location does not comply with Rule 1002.f. During this inspection, it was observed that there are no perimeter stormwater control measures installed that would prevent stormwater from commingling with contaminated/impacted soils on location and exiting off into adjacent areas. Contaminated soils are not properly contained/stored as the liner is deteriorated and the stockpile is showing signs of erosion degradation. Additional stormwater controls measures/BMPs are required for this location. Refer to attached inspection photos.</div> <div>Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C.</div> <div>Date: 05/08/2024</div> | | | | | | |
| 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 |
|--------------|----------------------|---|
| 403780746 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6537076 |
| 708201232 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6537074 |