

**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:

05/30/2024

Submitted Date:

06/03/2024

Document Number:

697602373

**FIELD INSPECTION FORM**Loc ID 318207 Inspector Name: Ahmadian, Alexander 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:**

8 Number of Comments

4 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	
Brown, Kari		kari.oakman@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
,		cogcc@kpk.com	All Inspections
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Peterson, John		jpeterson@kpk.com	KPK environmental
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	EI
479608	Flowline System	AC	03/12/2021		-	Facility 4 Consolidation	EI
485898	SPILL OR RELEASE	AC	02/12/2024		-	Facility 4 @ Ditlev C1	EI

**General Comment:**

This is an environmental inspection for the Facility 4 @ Ditlev C1/Spill ID 485898. There were no Operator or environmental contract personnel on location at the time of the inspection. Photos are attached to document site conditions.

Current site status: A small excavation is open next to the wellhead at Facility 4 @ Ditlev. Water, free product and visibly impacted soil were observed within the open excavation. A stockpile of contaminated soil remained onsite. Orange construction fencing surrounds the excavation and is in good condition. Unused stockpiled equipment is being stored on location and needs to be addressed. Audible sound not from flowlines within the open excavation - Sound appears to be from fluids flowing through the HDP flowlines within the open excavation.

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				
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:		Ongoing issue: Wellhead signage faded.		Date: 06/19/2024
Corrective Action:		Install sign to comply with Rule 605.d. CA due date listed as CA due date on FIR Doc #710100190 when corrective action was required.		
Good Housekeeping:				
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. 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: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				
Venting:				
Yes/No				
Comment:				
Corrective Action:				Date:
Flaring:				
Type				
Comment:				
Corrective Action:				Date:

Inspected Facilities									
Facility ID:	240872	Type:	WELL	API Number:	123-08660	Status:	PR	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
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:	485898	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	Ongoing issue: 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. Remediation activities are not being conducted in accordance with Rules 905.e. and 913.b.(5).B.i.-iv.			
Corrective Action	Per FIR Doc #697602260: "Properly treat or dispose of E&P waste in accordance with Rule 905." 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.			Date: 03/07/2024

**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. Note: Oil continues to leak from cut pipe within the open excavation onto soil and groundwater below.		
Corrective Action:	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." 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." Impacts to soil and groundwater remain insitu. CA due date backdated to due date on FIR Doc #697602260.		
			Date: 02/19/2024

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_

Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**ECMC Comments**

Comment	User	Date
Monitoring wells have been installed at the facility.	ahmadiaa	06/03/2024

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

Document Num	Description	URL
403811436	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6572125">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6572125</a>
697602374	Photolog	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6572122">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6572122</a>