

**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:

07/29/2024

Submitted Date:

07/29/2024

Document Number:

710100226

**FIELD INSPECTION FORM**Loc ID 467175 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:**

6 Number of Comments

1 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
Kauffman, KPK		cogcc@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Brown, Kari		kari.oakman@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467173	TANK BATTERY	AC	09/03/2019		-	KPK Tank Battery 28SWNE	EI
476532	SPILL OR RELEASE	CL	10/27/2020		-	HORST-SCHUTT PW Storage Vessel	EI

**General Comment:**

This is an environmental inspection to document site conditions and the status of the open remediation projects; All unaddressed CAs from previous inspections, COAs from approved forms and comments from denied forms still apply.

**Overview:**

Operator: KP Kauffman (KPK) HORST-SCHUTT PW Storage Vessel Spill

Spill ID: #476532

Spill Date of Discovery as reported on Initial Form 19,

Spill/Release Report (Doc #402403843) for the spill (Spill/Release Point ID: 476532): May 18, 2020

Initial date spill was observed by COGCC Inspectors: June 16, 2019

Remediation Projects: #23124 &amp; #14115

Location ID: #467175

Facility ID: #467173

Both Remediation Projects are late on quarterly reporting.

ECMC performed inspection on July 22nd, 2024.

No crews were onsite.

Current site status: Site conditions remain relatively unchanged from previous inspections (overall site conditions continue to deteriorate).

Produced water vessel excavation remains open, excavation sidewalls are collapsing, weeds present throughout location and within the open excavation, horizontal separator, ECD and (2) crude oil ASTs have been removed, associated on-location piping and earthen secondary containment berm remain on location.

Photos are attached to document site conditions since previous Field Inspection Report on 1/9/2024 (Doc #710100120).

Inspected Facilities									
Facility ID:	467173	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:	476532	Type:	SPILL OR	API Number:	-	Status:	CL	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Remediation excavation remains open. Excavation backfill was approved 11/16/2023 to address the ongoing threat to public health and safety at this location (document no 1561587).

Corrective Action: Prior to using imported material for backfill, samples must be collected to verify compliance with all Table 915-1 contaminants of concern and approved by ECMC. Operator shall provide 48 hour notice to area EPS and Nikki Graber (nikki.graber@state.co.us) prior to any sampling, soil boring, monitoring well installation or backfill on location.

Date: \_\_\_\_\_

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: \_\_\_\_\_

**ECMC Comments**

Comment	User	Date
<ul style="list-style-type: none"> <li>-Horizontal separator, ECD and (2) crude oil ASTs have been removed, associated onlocation piping and earthen secondary containment berm remain on location.</li> <li>-Remedial excavation remains open.</li> <li>-Excavation sidewalls have not been sloped or benched, are unstable, and have partially collapsed (failed soil mass observed in base of excavation adjacent to sidewall) and are showing signs of additional collapse (tension cracks/fissures, toppling, sloughing, bulding and subsidence).</li> <li>-No warning placards/signage present at excavation.</li> <li>-Signage at former tank battery has faded and is difficult to discern.</li> <li>-No signage present at location entrance.</li> <li>-No stormwater BMPs were observed</li> <li>-Stormwater erosion has continued</li> <li>-Gulley and rills have expanded both on location (including into the open excavation) and off-location (outside the footprint of the oil and gas location).</li> <li>-Excavation sidewalls and fencing have been undermined by erosion.</li> <li>-Excavation fencing installed remains inadequate - (torn, sagging, large gaps between fencing and ground, installed close to unstable sidewalls, etc.). To ensure the safety of the public, livestock, and wildlife near open excavations, Operator will fence or cover the excavation in a manner that prevents wildlife, livestock, and unauthorized personnel from entering the work zone when unattended. The choice of fencing or cover material used must be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc.</li> <li>-Animal prints were observed within the base of the excavation.</li> <li>-Weeds, trash, debris and water have been observed within the base of the open excavation.</li> <li>-Weeds, trash, debris were observed throughout the location.</li> <li>-Multiple uncapped/improperly capped flowlines extend into the open excavation.</li> <li>-A clay pipeline has been exposed on the southeast corner of the excavation. The pipe appears to have been damaged.</li> <li>-A buried utility line has been cut and is exposed in the northeastern corner of the excavation.</li> <li>-Two monitoring wells remain on location, a third has been has fallen into the western portion of the excavation.</li> <li>-Operator is late on quarterly reporting required by Rule 913.e.(3)</li> </ul>	andersoln	07/29/2024

**Attached Documents**

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

Document Num	Description	URL
710100227	2024_0722_Photo Documentation	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642463">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642463</a>
710100228	2024_0403_Photo Documentation	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642464">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642464</a>