

**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:

07/17/2024

Submitted Date:

07/29/2024

Document Number:

710100233

FIELD INSPECTION FORM

Loc ID 479010 Inspector Name: Anderson, Laurel On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

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

Findings:

- 11 Number of Comments
- 6 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
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479011	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
479012	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
479013	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
479014	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
480343	SPILL OR RELEASE	CL	01/13/2023		-	UPRR 42 Pan Am F #4	EI

General Comment:

This is an environmental inspection of Spill ID 480343.

Any corrective actions from previous inspections that have not been addressed are still applicable.

There were no operator or contract environmental personnel on location at the time of this field inspection.

Photos attached to document site conditions. Last FIR 6/12/2024 (Doc #697602388).

Excavation remains open.

Approximate excavation dimensions:

N-S 150'

E-W 55'

Depth 20'

Animal tracks and water have been observed previously within the base of the open excavation.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	OTHER		
Comment:	No signage at open excavation.		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____
Good Housekeeping:			
Type	WEEDS		
Comment:	See previous FIR. Ongoing Issue: Weeds present throughout work area and within open excavation.		
Corrective Action:	Comply with Rules 606.c. and 1003.f. Ongoing Issue: CA was originally issued on Inspection Document #689501444 on 11/7/2023.		Date: <u>11/14/2023</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:	Ongoing issue: Fencing not adequate to protect the environment, public health, safety and welfare and the environment. Fencing is torn, sagging and has gaps. Animal tracks were observed within the base of the open excavation. Excavation extent is <30' from the County Road.		
Corrective Action:	Operator shall immediatiately install, repair 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 ECOM Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences, roads, depth of excavation, presence of ground or surface water, livestock, wind, etc. Ongoing Issue: CA was originally issued on Inspection Document #689501444 on 11/7/2023.		Date: <u>11/14/2023</u>
Equipment:			
Type: Flow Line			#
Comment:	Flowlines appear to have been replaced with ~3" HDPE flowline pipe at the surface. Valve was open and flowline under pressure. See attached photos.		
Corrective Action:	Operator shall make repairs and install flowlines to comply with Rule 1102.e. which requires all installed flowlines and crude oil transfer lines have cover sufficient to protect them from damage. On cropland, all flowlines must have a minimum cover of three (3) feet. Notify area EPS and ECOM Integrity Inspector and Engineer 48 hours prior to conducting work. Provide ECOM Ingetgrity Inspector and Engineer photo documentation of work.		Date: <u>08/28/2024</u>
Type: Flow Line			#
Comment:	Multiple flowlines of unknown status were observed exposed within the open excavation.		

Corrective Action:	<p style="color: red;">Comply with ECMC 1100 Series Rules</p> <ul style="list-style-type: none"> -Repair all flowlines intended for return to service per Rule 1102.j. -For shut-in or out of service off-location flowlines or crude oil transfer lines, Operator shall comply with Rule 1102.o. -For flowlines being abandoned, Operator shall comply with ECMC Rule 1105 -Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per Rule 1102.j.7 (at well ASAP/second endpoint/facility prior to and during repair). -Historically abandoned/out of service flowlines exposed in the excavation must be abandoned per ECMC Rule 1105 (ends sealed per Rule 1105.e.4). <p style="color: red;">Provide documentation of completion to ECMC Integrity Inspector and Engineer.</p>	Date: <u>08/28/2024</u>
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Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities

Facility ID: 479011 Type: OFF- API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 479012 Type: OFF- API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 479013 Type: OFF- API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 479014 Type: OFF- API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 480343 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: Ongoing: Remediation excavation remains open. No water was observed within the excavation. No work has been done since the last inspection.

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

Spill/Remediation:

Comment: See previous FIRs.
Ongoing issue: Quarterly reporting is required for Remediation Project #25934. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on December 20, 2022 (Doc #403253747).

Corrective Action: Repeat CA. See previous FIRs.
In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (every 90 days).
Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated. This location was included in NOAV # 403513701 for violation of Rule 913.e.(3).
CA originally issued on Inspection Document #689501444 on 11/7/2023. Date: 03/23/2023

Emission Control Burner (ECB): _____

Comment:

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

Attached Documents

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

Document Num	Description	URL
710100234	2024_0717_Photo Documentation	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642944