

**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:

07/22/2024

Submitted Date:

07/29/2024

Document Number:

710100231

**FIELD INSPECTION FORM**

Loc ID \_\_\_\_\_ 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:**

- 10 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
Brown, Kari		kari.oakman@state.co.us	
Kauffman, KPK		cogcc@kpk.com	<a href="#">All Inspections</a>
Peterson, John	303-550-8872	jpeter@kpk.com	<a href="#">Director EHS &amp; Compliance</a>
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	<a href="#">all inspections.</a>
MacLaren, Joe		joe.maclaren@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
480127	SPILL OR RELEASE	CL	06/02/2022		-	RMF Consolidation Line	EI

**General Comment:**

This is an environmental inspection to determine progress on Spill ID 480127 and Remediation Project No 20120. 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.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type WEEDS

Comment: See previous FIRs.  
Ongoing issue: Weeds are overgrown within and outside of the excavation and through the excavation fencing and E&P waste stockpile.

Corrective Action: See previous FIRs.  
Repeat CA: Comply with Rule 606.  
CA due date based on CA from 7/10/2024 FIR (Doc #697602398).

Date: 07/24/2024

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Fencing/:**

Type OTHER

Comment: Excavation fencing is sagging and inadequate.

Corrective Action: Operator shall immediately 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 EPMC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc.

Date: 07/30/2024

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:

Date:

**Inspected Facilities**

Facility ID: 480127 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: See previous FIRs.Ongoing: Remediation excavation remains open. No work has been done since the last inspection.

Corrective Action: See previous FIRs.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: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)	
Oily Soil	Piles	Inadequate			
	Comment	<span style="color: blue;">See previous FIRs. Ongoing issue: The oily stockpile liner and oily soil remain on location. The oily soil has flattened and spread off the liner, most likely due to rain and stormwater washing out the soil on the liner. The liner has been ripped and compromised by weeds and vegetation growing through the liner.</span>			
	Corrective Action	<span style="color: red;">See previous FIRs. Repeat CA: 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. Operator shall provide photo documentation of stockpile liner integrity via 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.</span>			Date: _____

**Spill/Remediation:**

Comment: See previous FIRs.  
Ongoing issue: Quarterly reporting is required for Remediation Project #20120. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on December 7, 2022 (Doc #403201828) was denied. The last approved Supplemental Form 27 was received on May 11, 2022.

Corrective Action: See previous FIRs.  
Repeat CA: 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. Date: \_\_\_\_\_

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
403868791	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642608">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642608</a>
710100232	2024_0722_Photo Documentation	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642607">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6642607</a>