

**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:

09/05/2024

Submitted Date:

09/10/2024

Document Number:

710100245

**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

**Findings:**

15 Number of Comments

7 Number of Corrective Actions

Corrective Action Response Requested

**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

**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	
Graber, Nikki		nikki.graber@state.co.us	
Kauffman, KPK		cogcc@kpk.com	<a href="#">All Inspections</a>
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Marette, Brandon		brandon.marette@state.co.us	<a href="#">Northeast Region Energy Liason</a>
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Peterson, John	303-550-8872	jpeter@kpk.com	<a href="#">Director EHS &amp; Compliance</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478833	Flowline System	AC	12/17/2020		-	Facility 3	EI
487690	SPILL OR RELEASE	AC			-	Facility 3 @ Rasmussen Flowline	EI

**General Comment:**

This is an environmental inspection for Spill ID 487690 Facility 3 @ Rasmussen Flowline. 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.

Spill is located within:

- A publicly maintained road (Preserve Drive - has been closed and signage installed)
- The Town of Frederick
- A bald eagle roost high priority habitat with no wildlife protection equipment (e.g. netting) installed over open excavation

In close proximity to:

- Unmapped, unlined irrigation ditch (described as irrigation water running through field channel in attached photo documentation) located ~50' E, discharges to Boulder Creek
- Unmapped surface water pond (~140' N)
- Multiple occupied structures
- Osprey platform (<500' SW)

Free product and a sheen were observed on groundwater within the open excavation.

Stained soil remains in situ and is visible within the open excavation.

Excavation fencing has not been properly installed to encompass the entire perimeter of the excavation.

ECMC received a complaint (Doc #403911640) on 9/5/2024 in response to this spill.

**Location**

Overall Good:

**Signs/Marker:**

Type	OTHER		
Comment:	No signage present at open excavation.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:	No emergency contact information present.		
Corrective Action:		Date:	

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Fencing/:**

Type	OTHER		
Comment:	Orange construction fencing has been installed around the open excavation; however, fencing does not encompass the entire perimeter of the excavation and is not appropriate for site conditions.		
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 ECMC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences/schools, depth of excavation, presence of ground or surface water, livestock, wind, etc.		Date: 09/10/2024
Type	OTHER		
Comment:	Operator has installed traffic barricades along Preserve Drive; however, the barricades do not block the entire roadway and no warning signage was observed.		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Location Construction**

Location ID: 487690 CDP: \_\_\_\_\_

Comment:

Corrective Action:

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

**Form 2A COAs:**

**Comment:**

Corrective Action:

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

**Wildlife BMPs:**

**Comment:**

Corrective Action:

Date:

**Comment:**

**Corrective Action:**

Date:

**On Site Inspection (305):**

Surface Owner Contact Information:

Name: \_\_\_\_\_ Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Operator Rep. Contact Information:

Landman Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Date Onsite Request Received: \_\_\_\_\_ Date of Rule 306 Consultation: \_\_\_\_\_

Request LGD Attendance: \_\_\_\_\_

LGD Contact Information:

Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_ Agreed to Attend: \_\_\_\_\_

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

**Inspected Facilities**

Facility ID: 478833 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: 487690 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

**Complaint**

Comment: ECMC received a Complaint (Doc #403911640) from the landowner on 9/5/2024. The complaint details the landowners notes on spill response and remediation activities to date and includes email correspondence with KPK. The complaint indicates KPK did not promptly respond to notice of the spill when contacted by the landowner and other Operator personnel, KPK did not make timely repairs to the flowline (flowline was not exposed until 8/26/2024, flowlines was not properly repaired until 8/29/2024, and no additional remedial excavation has taken place since 8/29/2024 when additional soil was removed during flowline repair work. The landowner has requested KPK remediate impacts to soil and groundwater ASAP. In an email correspondence KPK personnel stated: "Your site (we call it "Facility 3 @ Rasmussen") is a top priority. Right now, there is no digging at your site because we are having contractual issues with the landfills, so we cannot dispose of waste at the moment. I suspect those issues may be resolved in the next 2 weeks but I don't know for sure."

Corrective Action: Operator shall comply with Rule 912.a.  
CA Due date backdated to date of discovery.

Date: 08/23/2024

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**Environmental**

**Spills/Releases:**

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

Comment: Spill is located within a CPW mapped high priority habitat for bald eagle roost. Compliance with Rule 912.b.(10) was required by August 24, 2024. ECMC has not received documentation of consultation with CPW to date.

Corrective Action: Per Rule 912.b.(10) at the same time the Operator submits a Form 19i Operator's are required to provide written and/or verbal notification to CPW if the Spill or Release occurred within 300 feet of surface Waters of the State or within a mapped high priority habitat. Operator has not indicated CPW has been notified. Operator shall notify CPW immediately and provide the correspondence on the subsequent Supplemental Form 19. Date: 09/10/2024

Reportable: YES GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: 50 Depth to Ground Water: 7

**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	Visibly impacted soils remain in-situ in the open excavation and free product present on groundwater within the open excavation.		
Corrective Action	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 or Form 27 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.	Date:	

**Spill/Remediation:**

Comment: Soil has been removed and the failed segment of the flowline exposed and repaired prior to this inspection. Stained soils remain in-situ and free product was observed on groundwater within the open excavation.

Corrective Action: 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. CA date back dated to date of discovery when corrective action was first required. Date: \_\_\_\_\_

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? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

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 REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-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? \_\_\_\_\_

Comment Per Rule 1003, all disturbed areas affected by drilling or subsequent operations shall be reclaimed.  
Vehicle rutting from initial spill response activities was observed in the grassy area adjacent to Preserve Drive.

Corrective Action Operator shall comply with Rule 1003 to repair all rutting and reseed as soon as environmental conditions will permit using a seed mixture requested by the surface owner or a mixture prescribed by the local county NRCS. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Ensure erosion controls are implemented to stabilize the seeded soil. Operator shall continue to monitor and manage this site until the location meets Rule 1003 standards, including weed management.

Date \_\_\_\_\_

Overall Interim Reclamation

**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:

Corrective Action:

Date \_\_\_\_\_

Overall Final Reclamation \_\_\_\_\_

Well Release on Active Location

Multi-Well Location

**ECMC Comments**

Comment	User	Date
<p>ECMC received a Complaint (Doc #403911640) from the landowner on 9/5/2024. The complaint details the landowners notes on spill response and remediation activities to date and includes email correspondence with KPK. The complaint indicates KPK did not promptly respond to notice of the spill when contacted by the landowner and other Operator personnel, KPK did not make timely repairs to the flowline (flowline was not exposed until 8/26/2024, flowlines was not properly repaired until 8/29/2024, and no additional remedial excavation has taken place since 8/29/2024 when additional soil was removed during flowline repair work. The landowner has requested KPK remediate impacts to soil and groundwater ASAP. In an email correspondence KPK personnel stated: "Your site (we call it "Facility 3 @ Rasmussen") is a top priority. Right now, there is no digging at your site because we are having contractual issues with the landfills, so we cannot dispose of waste at the moment. I suspect those issues may be resolved in the next 2 weeks but I don't know for sure."</p>	andersoln	09/10/2024

**Attached Documents**

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

Document Num	Description	URL
710100246	Facility 3 @ Rasmussen Flowline Photo Documentation	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699385">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699385</a>