

**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:

09/11/2024

Document Number:

710100261**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Anderson, Laurel 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1700 LINCOLN ST STE 4550City: DENVER State: CO Zip: 80203**Status Summary:**

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

**Findings:**12 Number of Comments7 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                        |
|------------------|--------------|-----------------------------|--------------------------------|
| Peterson, John   | 303-550-8872 | jpeterson@kpk.com           | Director EHS & Compliance      |
| Brown, Kari      |              | kari.oakman@state.co.us     |                                |
| Marette, Brandon |              | brandon.marette@state.co.us | Northeast Region Energy Liason |
| Watzman, Ross    | 303-825-4822 | rwatzman@kpk.com            |                                |
| Kauffman, KPK    |              | cogcc@kpk.com               | All Inspections                |
| Graber, Nikki    |              | nikki.graber@state.co.us    |                                |

**Inspected Facilities:**

| Facility ID | Type                  | Status | Status Date | Well Class | API Num | Facility Name        | Insp Status |
|-------------|-----------------------|--------|-------------|------------|---------|----------------------|-------------|
| 476382      | OFF-LOCATION FLOWLINE | AC     | 01/07/2021  |            | -       | Wellhead Line 36NWNW | EI          |
| 486562      | SPILL OR RELEASE      | AC     |             |            | -       | Sam Funakoshi A2     | EI          |

**General Comment:**

This is an environmental inspection to determine progress on Spill ID 486562 and to document site conditions at the time of inspection. All unaddressed and/ongoing COAs, CAs and comments from previously approved and/or denied forms, and field inspection reports remain applicable. No Operator personnel or contractors were on location at the time of inspection. There were no environmental personnel on location at the time of inspection. Photos attached to document site conditions.

Sam Funakoshi A2 - Spill ID #486562

Reported Date of Discovery: 04/09/2024

Spill locations lies within Bald Eagle Active Nest Site Qtr Mile High Priority Habitat and <300' from surface water and a riverine wetland. Operator shall continue to consult with CPW regarding wildlife BMPs.

Observations:

Trash/debris/pieces of torn liner were observed onsite (see photos)

A hydrocarbon sheen was previously observed on groundwater within the open excavation (4/22/2024 - No FIR entered. Photos attached for documentation)

BMPs for stockpiled E&P waste are inadequate - E&P waste has spilled outside of secondary containment

Fencing around the open excavation is inadequate and does not surround the entire perimeter of the open excavation

Excavation side walls have begun to collapse

No wildlife protection measures (e.g. netting) were observed

Weeds are present throughout the work area and have begun to grow within the stockpiled soil

**Location**Overall Good: ☐

|                      |  |       |  |
|----------------------|--|-------|--|
| <b>Signs/Marker:</b> |  |       |  |
| Type                 | OTHER                                  |       |  |
| Comment:             | No signage present at open excavation. |       |  |
| Corrective Action:   |  | Date: |  |

|                           |             |  |  |
|---------------------------|-------------|--|--|
| Emergency Contact Number: |             |  |  |
| Comment:                  |             |  |  |
| Corrective Action:        | Date: _____ |  |  |

|                           |  |  |                  |
|---------------------------|--|--|------------------|
| <b>Good Housekeeping:</b> |  |  |                  |
| Type                      | OTHER  |  |                  |
| Comment:                  | Weeds/debris/trash observed on location.   |  |                  |
| Corrective Action:        | Lack of maintenance/good housekeeping procedures - see above statement (see photos). Comply with Rules 606 and 1002.f.(2).D. |  | Date: 09/18/2024 |

Overall Good: ☐

|                |      |        |  |  |
|----------------|------|--------|--|--|
| <b>Spills:</b> |      |        |  |  |
| Type           | Area | Volume |  |  |

In Containment: No

Comment: ☐ Multiple Spills and Releases?

|                    |  |  |                  |
|--------------------|--|--|------------------|
| <b>Fencing/:</b>   |  |  |                  |
| Type               | OTHER  |  |                  |
| Comment:           | Orange construction fencing installed around the open excavation does not encompass the entire perimeter of the excavation and is sagging. Excavation sidewalls have started to collapse.  |  |                  |
| Corrective Action: | Operator shall continuously monitor and maintain [BMPs] 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, depth of excavation, presence of ground or surface water, livestock, wind, etc. when sites are not attended. |  | Date: 09/12/2024 |

|                    |  |       |  |
|--------------------|--|-------|--|
| <b>Venting:</b>    |  |       |  |
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

|                    |  |       |  |
|--------------------|--|-------|--|
| <b>Flaring:</b>    |  |       |  |
| Type               |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

### Location Construction

Location ID: 486562 CDP: \_\_\_\_\_

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

Corrective Action: \_\_\_\_\_

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

#### Form 2A COAs:

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

Corrective Action: \_\_\_\_\_

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

#### Wildlife BMPs:

Comment: Location lies within the CPW high priority habitat buffer for Bald Eagle Active Nest Site Qtr Mile High Priority Habitat and <300' from surface water and a riverine wetland. No wildlife protection equipment (e.g. netting) has been installed at the open excavation.

Corrective Action: Operator shall install wildlife protection equipment and provide documentation of consult with CPW regarding the timeframe for work and recommendations for wildlife BMPs. Operator shall provide documentation via Supplemental Form 19/27.

Date: 09/25/2024

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:

\_\_\_\_\_



| Environmental                                       |   |            |                  |  |                  |
|---|---|------------|------------------|--|------------------|
| <b>Waste Management:</b>                            |   |            |                  |  |                  |
| Type  | Management  | Condition  | GPS (Lat) (Long) |  |                  |
| Oily Soil   | Piles   | Inadequate |                  |  |                  |
| Comment   | E&P Waste is stockpiled on location with inadequate BMPs.   |            |                  |  |                  |
| 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 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 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:            |
| <b>Spill/Remediation:</b>                           |   |            |                  |  |                  |
| Comment:  | A segment of the flowline has been exposed and soils removed from the location. A hydrocarbon sheen has been observed on groundwater within the excavation.<br>Per COA on Form 19i/s Doc #403749640: "Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director." |            |                  |  |                  |
| Corrective Action:                                  | Spill remains open past 90 days. No Form 19s nor Form 27i have been received for Spill ID 486562 to date (as of 9/11/2024). Operator shall immediately submit a Form 27i for site investigation and remediation of this spill and request closure of the Spill with work proceeding under the Remediation Project number assigned on the approved 27i.<br>CA due date back listed as 90 days from the date of discovery.  |            |                  |  | Date: 07/08/2024 |
| 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? \_\_\_\_\_ F \_\_\_\_\_

Comment

Surface has been disturbed by spill response and remediation activities.  
All disturbed areas shall be reclaimed as early and as nearly as practicable to their original condition or their final land use as designated by the surface owner and shall be maintained to control dust and minimize erosion to the extent practicable.

Corrective Action

Operator shall restore and revegetate all disturbed areas in accordance with Rule 1003.b. and 1003.e.(2). Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards, including stormwater and weed management.

Reclamation activities shall be complete as soon as environmental conditions will permit.

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 ☐

Storm Water:

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
|                  |                 |                         |                       |               |                          |         |

Comment: 

Inadequate BMPs in place to control stormwater run-on and runoff.

Corrective Action: 

Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Install BMPs in accordance with 1002.f.(2) to prevent runoff and completely contain impacts. CA due date listed as date this FIR was submitted. Immediate corrective action is required to the further spread of E&P waste.

Date: 

09/11/2024

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

| Document Num | Description                   | URL   |
|--------------|-------------------------------|---|
| 710100262    | 7/22/2024 Photo Documentation | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6701301">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6701301</a> |
| 710100263    | 4/22/2024 Photo Documentation | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6701302">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6701302</a> |