

**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:

09/09/2024

Document Number:

710100242**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:**11 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
MacLaren, Joe		joe.maclaren@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478839	Flowline System	AC	06/06/2024		-	Facility 8	EI
479923	SPILL OR RELEASE	CL			-	George Norden Consolidation	EI
487301	SPILL OR RELEASE	AC			-	George Norden West	EI

**General Comment:**

Comobined environmental inspections were conducted on July 17, 2024, by ECMC Environmental Protection Specialists Laurel Anderson, to document spill response and ongoing remediation activities at two flowline spills along KP Kauffmans Facility 8 Flowline System (Facility ID 478839):

George Norden West - Spill ID 487301 / Date of Discovery 7/16/2024

George Norden Consolidation - Spill ID 479923/ Remediation Project 19716/Date of Discovery 4/29/2021

Any corrective actions from previous inspections that have not been addressed are still applicable. Any comments/conditions of approval from previously denied/approved forms that have not been addressed are still applicable.

No Operator or contract personnel were on location at the time of either inspection.

Photos attached to document site conditions.

George Norden West - Spill ID 487301

Open excavation in Weld CR 89 right-of-way

Free product observed on groundwater within open excavation

Property fencing removed needs reinstalled

Surface/vegetation scraped needs reclaimed

Strong odor

Visibly stained soil remains observed within open excavation

Sidewalls of the open excavation are unstable and collapsing

Located <200' from unmapped surface water

Site controls and BMPs are inadequate

George Norden Consolidation - Spill ID 479923/ Remediation Project 19716/Date of Discovery 4/29/2021

See previous inspections for Corrective Actions (housekeeping, reporting)

Both spills are located within:

CPW Mule Deer Migration Corridor High Priority Habitat

Fort Lupton

Located within PWS - GUDI & Type III Wells - Generalized External Buffer

Adjacent to City of Aurora Water - Prarie Water Project

100-year effective floodplain

The spills are located ~300 feet apart and both excavations are open and have been infiltrated by groundwater

**Location**Overall Good: ☐**Signs/Marker:**

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

**Emergency Contact Number:**

Comment:		Date: _____
Corrective Action:		

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type	OTHER		
Comment:	Property fencing was taken down. Landowner has requested the fencing be reinstalled.		
Corrective Action:	Operator shall reinstall property fence and consult with landowner regarding future access.	Date:	09/10/2024
Type	OTHER		
Comment:	Orange construction fencing has been installed around the open excavations; however, fencing is not adequate for site conditions.		
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 public roadway, residences, depth of excavation, presence of ground or surface water, livestock, wind, etc. when sites are not attended.	Date:	09/10/2024

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



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

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

Comment: Visibly impacted soil and groundwater remain insitu within the open excavation at George Norden West and are in close proximity to City of Aurora Prairie Water Project and associated monitoring wells.

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered. Operator shall consult with City of Aurora to discuss sampling of the existing monitoring wells. Additionally, Operator shall control and contain spills/releases and clean up per Rule 912.a. and notify ECMC Area EPS and DJ Basin Region Environmental Supervisor, Nikki Graber (nikki.graber@state.co.us), at least 48 hours prior to backfill, monitoring well installation, or any sampling events performed on location.

Date: 09/10/2024

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

Proximity to Surface Water: 185 Depth to Ground Water: 4

**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	Other				
Comment	Stained soils remain in-situ in 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 Form 19 or Form 27 per Rule 905.b.(3).				Date: _____

**Spill/Remediation:**

Comment: A segment of the flowline has been exposed and soils removed from the location. Stained soils remain in-situ in the open excavation. Free product was observed on groundwater within the 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.  
Remove free product and impacted groundwater.

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 SEGREGATION \_\_\_\_\_

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

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: Corrective Action: 

Date: 09/17/2024

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
403914675	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699323">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699323</a>
710100243	George Norden West Photo Documentation	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699319">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699319</a>
710100244	George Norden Consolidation Photo Documentation	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699320">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699320</a>