

**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: _____ 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:**15 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
Graber, Nikki		nikki.graber@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Brown, Kari		kari.oakman@state.co.us	

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.

LocationOverall 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		
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In Containment: No

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

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:	
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

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: Location lies within the CPW high priority habitat buffer for Bald Eagle Roost. No wildlife protection equipment (e.g. netting) has been installed at the open excavation.

Corrective Action: Comply with Rule 902.b to immediately install or repair wildlife protection equipment. The location will remain out of compliance until the corrective action has been resolved. Remediation and other work needs to be completed prior to the start of nesting season.

Date: 09/10/2024

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:

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 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 REVEGETATIONCropland

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
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."	andersoln	09/10/2024

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

Document Num	Description	URL
403914762	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699392
710100246	Facility 3 @ Rasmussen Flowline Photo Documentation	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6699385