

**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:

09/21/2024

Submitted Date:

10/14/2024

Document Number:

710100273

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
 _____ Anderson, Laurel _____ 2A Doc Num: _____

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

Status Summary:

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

Findings:

12 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
Rollins, Grace		grace.rollins@state.co.us	
Peterson, John	303-550-8872	jpetersen@kpk.com	Director EHS & Compliance
Brown, Kari		kari.oakman@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@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
239936	WELL	SI		OW	123-07724	NESSSU 3	SI
336275	LOCATION	AC			-	NESSSU-62N66W 17SESW	EI
451672	TANK BATTERY	AC			-	UPRR 42 Pan Am K battery	EI
478843	Flowline System	AC	12/17/2020		-	Facility 9	EI
484569	SPILL OR RELEASE	CL			-	Facility 9 Con. Line (K Section)	EI

General Comment:

ECMC Environmental Field Inspection Report Summary

On September 23, 2024, at approximately 14:15 pm ECMC Environmental Protection Specialists, Laurel Anderson and Grace Rollins, conducted an on-site inspection of the following KP Kauffman (Operator) facilities:

Nessu-62N66W#17SESW (Location ID 336275)

UPRR 42 Pan Am K battery # (Facility ID 451672)

NESSU #3 Well (API #05-123-07724)

Facility 9 (Facility ID 478843)

Facility 9 Con. Line (K Section) (Spill ID 484569 & REM 31776)

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

Photos from 4/24/2024 and 9/23/2024 site visits attached to document site conditions.

Corrective Actions are required.

Any ongoing and/or unaddressed corrective actions from previous inspections, conditions of approval from approved forms and/or comments from denied forms remain applicable.

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	No signage at open excavation.		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:	Emergency contact number at the wellhead is from previous Operator.		
Corrective Action:		Date:	

Good Housekeeping:			
Type	WEEDS		
Comment:	Weeds are overgrown at the wellhead, tank battery and within/around the open excavation. Ongoing issue.		
Corrective Action:	Comply with Rules 606.c. and 1003.f.		Date: 10/28/2024

Overall Good: ☐

Spills:			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			

Fencing/:			
Type	OTHER		
Comment:	Fencing around open excavation is partially downed and does not encompass the entire excavation. No signage is present.		
Corrective Action:	Operator shall continuously monitor 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 ECOM 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. Operator shall continuously monitor and maintain fencing around the entire spill area.		Date: 10/14/2024

Equipment:		corrective date	
Type: Horizontal Separator	# 1		
Comment:	The earthen berm surrounding the separator is inadequate. The base and walls are not sufficient enough for containment. See Past Due CA from FIR Doc #697602280.		
Corrective Action:		Date:	
Type: Gathering Line	#		
Comment:	Ongoing issue. Flowlines or crude oil transfer lines not maintained to prevent failures or leakage. Integrity issues not corrected. Valves not locked and tagged out. See Past Due CA from FIR Doc #697602280.		
Corrective Action:		Date:	

Venting:			
Yes/No			
Comment:			

Corrective Action:		Date:	
Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Per FIR Doc #697602280: "High salt content was observed surrounding the flowline riser, indicating a spill." Stained soil remains insitu around the flowline riser south of the crude oil AST and produced water vessel earthen secondary containment berms.

Corrective Action: Per FIR Doc #697602280: "Report spill or release of E&P waste or produced fluids Remove free fluids and contact COGCC EPS staff per Rule 912.b. Operator shall immediately submit a Form 19 for this location. If impacts remain in-situ Operator will immediately submit a Form 19 that includes a specific workplan and timeline to address the impacts." CA Due date back dated to FIR Doc #697602280.

Date: 03/18/2024

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Spill/Remediation:

Comment: A segment of the flowline has been exposed.

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.

Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Storm Water:

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

Comment: Soil of unknown origin has been stockpiled on location with inadequate BMPs. 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 runoff and completely contain impacts.

Date: 10/28/2024

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
710100274	2024_0923_Facility 9 Con. Line (K Section) & UPRR 42 PAN AM K TB	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744956
710100275	2024_0424_UPRR 42 PAN AM K TB Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744957
710100276	2024_0424_Facility 9 Con. Line (K Section) Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744958