

**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:

10/03/2024

Submitted Date:

10/14/2024

Document Number:

717100019

**FIELD INSPECTION FORM**

Loc ID \_\_\_\_\_ Inspector Name: Rollins, Grace On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**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

**Findings:**

- 15 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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	<a href="#">all inspections.</a>
,		cogcc@kpk.com	<a href="#">All Inspections</a>
Peterson, John		jpeter@kpk.com	<a href="#">KPK environmental</a>
Anderson, Laurel		laurel.anderson@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Marette, Brandon		brandon.marette@state.co.us	<a href="#">Northeast Region Energy Liason</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	AC
487690	SPILL OR RELEASE	AC			-	Facility 3 @ Rasmussen Flowline	AC

**General Comment:**

Combined Environmental inspections conducted October 3rd and 10th, 2024, by ECMC Environmental Protection Specialists Grace Rollins and Laurel Anderson and DJ Basin Region Environmental Supervisor, Nikki Graber, to document determine progress on Spill ID 487690. Any corrective actions from previous inspections that have not been addressed are still applicable. Photos attached to document site conditions. The findings are environmental inspections conducted on 10/03/2024 and 10/10/2024 and presented in this combined Inspection Report.

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 (note: netting was observed across the open excavation on 10/10/2024)

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)

10/03/2024: Operator's environmental personnel were on location to collect confirmation soil samples from the excavation at time of the field inspection. Gray to black staining was observed on portions of the base of the excavation and along portions of the western sidewall. Groundwater with free product was observed on portions of the base of the excavation. A strong petroleum hydrocarbon odor was observed when impacted media was disturbed.

10/10/2024: There were no operator or contract environmental personnel on location at the time of the field inspection. Groundwater with free product continued to be observed on portions of the base of the excavation. Stained soil and groundwater with free product remain in situ at the base of the excavation. Soil appears to have been added to the base of the excavation since the previous inspection (10/3/2024). As evidenced by: pages 1 through 4 of the attachment titled "Photo Log - 10.10.2024". ECMC has not approved backfill at this location - see attached email correspondence dated October 10th, 2024 (attachment titled "Email Correspondence - 10.10.2024").

"Clean" soil was stockpiled on location with inadequate stormwater BMPs

**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:	_____

**Good Housekeeping:**

Type				
Comment:				
Corrective Action:			Date:	

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Fencing/:**

Type	OTHER			
Comment:	Per Field Inspection Reports Doc # 710100245 and 714300136: "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."  The fencing had been removed at the time of inspection, due to sampling activities on 10/03/2024. Orange construction fencing had been installed around the open excavation at the time of the inspection on 10/10/2024.			
Corrective Action:			Date:	
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: AC

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: AC

**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 had 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."

Additional soil has been removed since ECMC received this complaint; however, stained soil and groundwater with free product remains in situ at the base of the excavation but appears to have been partially covered by backfilling, which has not been approved by ECMC.

Corrective Action: [Operator shall comply with Rule 912.a.](#)

[CA Due date backdated to date of discovery, per Inspection Report Doc. # 710100245.](#)

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: Confirmation soil sampling was conducted by Operator during ECMC inspection. Soil samples were collected in accordance with Rule 915.e.(2).b. Laboratory analytical results have not yet been provided to ECMC. Gray to black staining was observed at the base of the excavation and along portions of the western sidewall. Groundwater with free product was observed on portions of the base of the excavation. A strong petroleum hydrocarbon odor was observed when impacted media was disturbed. Operator states per email to ECMC on 10/09/2024: "The floor has been excavated about 1 foot below the groundwater table." Groundwater was observed on portions of the base of the excavation during the confirmation soil sampling event on 10/03/2024. However, groundwater was not observed covering the entire base of the excavation, nor was it observed at a depth of 1 foot during any ECMC inspections. Remedial excavation activities to date appear to have been limited to the vadose zone. The failed flowline remains exposed within the excavation. Per Field Inspection Report Document No. 714300136, a Form 27 is required due to impacts to groundwater. ECMC notes that initial Form 27 Document No. 403909415 was submitted to ECMC on 09/25/2024 and is currently in process for review.

Corrective Action: Operator shall comply with Rule 912.a. CA Due date backdated to date of discovery, per Inspection Report Doc. # 710100245. Date: 08/23/2024

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

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)	
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: 08/23/2024

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? \_\_\_\_\_

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, noninvasive 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

**Attached Documents**

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

Document Num	Description	URL
717100020	Photo Log - 10.03.2024	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744959">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744959</a>
717100021	Photo Log - 10.10.2024	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744960">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744960</a>
717100022	Email Correspondence - 10.10.2024	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744961">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744961</a>
717100023	Email Correspondence - CPW Notification - 09.20.2024	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744962">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744962</a>
717100024	Email Correspondence - 09.25.2024	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744963">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744963</a>