

**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: _____ On-Site Inspection ☐
 _____ Rollins, Grace _____ 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:

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 |
|------------------|----------------|-----------------------------|--------------------------------|
| Brown, Kari | | kari.oakman@state.co.us | |
| Watzman, Ross | (303) 825-4822 | rwatzman@kpk.com | all inspections. |
| , | | cogcc@kpk.com | All Inspections |
| Anderson, Laurel | | laurel.anderson@state.co.us | |
| Peterson, John | | jpeterson@kpk.com | KPK environmental |
| Ferrin, Jeremy | | jeremy.ferrin@state.co.us | |
| Graber, Nikki | | nikki.graber@state.co.us | |
| Marette, Brandon | | brandon.marette@state.co.us | Northeast Region Energy Liason |

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

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: | |

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: | 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: | <p>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."</p> <p>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.</p> | | |
| 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:** Location lies within the CPW high priority habitat buffer for Bald Eagle Roost. Wildlife protection equipment (netting) has been installed at the open excavation. Remediation and other work needs to be completed prior to the start of nesting season.

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: | <p>ECMC received a Complaint (Doc # 403911640) from the landowner on 9/5/2024.</p> <p>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.</p> <p>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."</p> <p>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.</p> | | | | | | | | |
| Corrective Action: | <p>Operator shall comply with Rule 912.a.</p> <p>CA Due date backdated to date of discovery, per Inspection Report Doc. # 710100245.</p> | | | | | | | 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:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

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 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, 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 |
|--------------|--|---|
| 403955970 | INSPECTION SUBMITTED | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744965 |
| 717100020 | Photo Log - 10.03.2024 | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744959 |
| 717100021 | Photo Log - 10.10.2024 | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744960 |
| 717100022 | Email Correspondence - 10.10.2024 | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744961 |
| 717100023 | Email Correspondence - CPW Notification - 09.20.2024 | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744962 |
| 717100024 | Email Correspondence - 09.25.2024 | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6744963 |