

**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:

10/10/2024

Submitted Date:

10/30/2024

Document Number:

710100294

FIELD INSPECTION FORM

Loc ID 323205 Inspector Name: Anderson, Laurel 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:

- 14 Number of Comments
- 7 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	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Graber, Nikki		nikki.graber@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
244914	WELL	PR	04/01/2024	GW	123-12709	JORDAN 34-4	PR
323205	LOCATION	AC			-	JORDAN-61N65W 34NESE	EI

General Comment:

ECMC Environmental Field Inspection Report Summary

On October 10, 2024, at approximately 11:40 am ECMC Environmental Protection Specialists, Laurel Anderson and Grace Rollins, conducted an on-site inspection of the following KP Kauffman (Operator) facilities:

Jordan 34-4 Well (API 05-123-12709)

JORDAN-61N65W34NESE Location (Location ID 323205)

Photos attached document site conditions at the time of this inspection.

Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable.

Current site status:

-Stained soil (roughly ~13' x ~8.5') remains in situ in the area surrounding the western portion of the 300 bbl crude oil AST. The stained soil has been covered with a thin layer of dirt/fill material since the previous inspection. The valve on the west side of the 300 bbl steel crude oil AST was leaking at the time of inspection (see attached photo log titled Soil Height Comparison documenting the change in soil height relative to the tank components on 9/20/2024 by ECMC, some time between 9/20/2024 and 10/3/2024 by KPK, and on 10/10/2024 by ECMC.).

-Overgrown weeds have been removed; however, weeds remain present throughout the location.

-NFPA placards have been painted onto the crude oil AST.

-Cattle fencing has been installed around the pumpjack.

-Staining observed beneath the pumpjack engine remains.

-Staining at the wellhead has been cleaned up and documentation attached to FIR Resolution Form Doc #403944678.

-The crude oil AST and concrete produced water vault's earthen berm has been partially repaired but remains inadequate.

While onsite ECMC collected two soil samples. PIDs ranged from 36.4 in SS-02@0-6" to 201.6 ppm in SS-01@0-6". Both samples were collected adjacent to the 300 bbl steel crude oil AST valve (North and South) from visibly impacted soil beneath the thin layer of newly placed fill material and outside the area saturated by oil from the active leak. The samples were packed in laboratory provided jars using standard environmental practices and immediately placed on ice and submitted under standard chain of custody for laboratory analysis of Table 915-1 organic compounds in soil. The laboratory analytical report and a table summarizing the results are attached. Both samples exceeded Table 915-1 Standards for TPH. Soils within the earthen secondary containment berm are comprised of loose sandy silt with gravel therefore vertical migration is suspected. Based on soil lithology ECMC estimates the spill volume to be between 2.67 and 6.67 bbls. The spill has migrated to the subsurface and is therefore not fully contained within a liner, Conservative Table 900-3 conversion estimates the spill between 1.2 and 3.1 barrels which is reportable in accordance with Rule 912.b.1.B.

ECMC personnel called the posted Emergency Contact Number (303)825-4822 at 12:51 pm, to notify the Operator of the active leak. Operator personnel directed ECMC to call (303)833-5670 to report the active leak. ECMC spoke with Operator personnel at the second phone number at 12:54 pm reported the location and source of the active leak as well as communicated that an Initial Form 19 was required based on the staining observed and the requirement would be reiterated via ECMC Field Inspection Report. See attached corrective actions. ECMC has not received a Form 19 Initial to date (as of 10/30/2024).

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	Per FIR Doc #717100002: NFPA placards were faded and not legible. Operator has painted NFPA placards on the 300 bbl crude oil AST and signage is present at the 50-bbl partially buried concrete produced water vessel. CA is complete.		
Corrective Action:			Date:
Emergency Contact Number:			
Comment:	ECMC personnel called the posted Emergency Contact Number (303)825-4822 at 12:51 pm, to notify the Operator of the active leak and heavy staining remaining in situ indicative of a previous spill. Operator personnel directed ECMC to call (303)833-5670 to report the leak and staining.		
Corrective Action:	Operator shall update all signage with the desired Emergency Contact Number to comply with Rule 605.		Date: <u>12/29/2024</u>
Good Housekeeping:			
Type	TRASH		
Comment:	Per FIR Doc #717100002: "Trash observed within berm." Trash has been removed from the location. CA is complete.		
Corrective Action:			Date:
Type	UNUSED EQUIPMENT		
Comment:	Per FIR Doc #717100002: "Unused equipment observed around pumpjack." Unused equipment remains.		
Corrective Action:	Comply with Rule 606. CA due date backdated to FIR Doc #717100002		Date: <u>10/25/2024</u>
Type	WEEDS		
Comment:	Per FIR Doc #717100002: "Weeds observed throughout location" Ongoing issue: Weeds remain present on the location. Operator has removed overgrown weeds from the location (within the earthen secondary containment berms and from the area around the wellhead); however, weeds remain present throughout the location (within the earthen secondary containment berms, around fencing, and around the wellhead).		
Corrective Action:	Comply with Rule 606. CA due date backdated to FIR Doc #717100002		Date: <u>10/25/2024</u>
Type	OTHER		
Comment:	Per FIR Doc #717100002: "Staining was observed around the wellhead and underneath the pumpjack engine." Operator has removed stained soil from around the wellhead and provided photo documentation attached to FIR Resolution Form Doc #403944678. However, staining observed beneath the pumpjack engine remains.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e. Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e. CA due date backdated to FIR Doc #717100002		Date: <u>10/25/2024</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Crude Oil	Tank	>= 5 bbls	

Comment:	Per FIR Doc #717100002: "Heavy staining indicative of a containment failure observed at the footprint of the production tank." Stained soil (roughly ~13' x ~8.5') remains insitu in the area surrounding the western portion of the 300 bbl crude oil AST. The stained soil has been covered with a thin layer of dirt/fill material since the previous inspection (see attached photo log titled Soil Height Comparison documenting the change in soil height relative to the tank components on 9/20/2024 by ECMC, some time between 9/20/2024 and 10/3/2024 by KPK, and on 10/10/2024 by ECMC.).		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e and report in accordance with 912. ECMC spoke with Operator personnel at the second phone number at 12:54 pm reported the location and source of the active spill as well as communicated that an Initial Form 19 would be required and the requirement would be reiterated via ECMC Field Inspection Report. CA backdated to 24 hours following ECMC's notification to Operator. As of 10/30/2024, an Initial Form 19 has not been submitted.	Date:	10/11/2024
Crude Oil	Tank	<= 1 bbl	
Comment:	Active leak from valve on west side of 300-bbl steel Crude Oil AST.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e. Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e. CA due date backdated to date Operator was notified of active leak requiring immediate repair.	Date:	10/10/2024

In Containment: No

Comment: Based on soil lithology ECMC estimates the spill volume to be between 2.67 and 6.67 bbls. The spill has migrated to the subsurface and is therefore not fully contained within a liner. Conservative Table 900-3 conversion estimates the spill between 1.2 and 3.1 barrels which is reportable in accordance with Rule 912.b.1.B..

Multiple Spills and Releases?

Fencing/:			
Type	PUMP JACK		
Comment:	Per FIR Doc #717100002: "Inadequate livestock fencing was observed at pumpjack." Cattle Fencing has been installed around the pumpjack. CA is complete.		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		
Comment:					
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate

Comment:	<p>Shared containment with 50-bbl partially buried produced water vessel. Per FIR Doc #717100002: "Rodent burrows were observed in the berm." See Inspector Comments - The crude oil AST and concrete produced water vault's earthen berm has been partially repaired but remains inadequate. Berm base and wall materials are comprised of loose sandy silt with gravel, have weeds and still show signs of animal burrowing.</p>	
Corrective Action:	<p>Repair or install berms or other secondary containment devices per Rule 912.d.(1). CA due date backdated to FIR Doc #717100002</p>	Date: <u>10/25/2024</u>

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 244914 Type: WELL API Number: 123-12709 Status: PR Insp. Status: PR

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 323205 Type: LOCATION API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

ECMC Comments

Comment	User	Date
<p>Previous inspection was performed on 9/20/2024 (Doc #717100002) FIR Resolution Form Doc #403944678 was submitted by the Operator on 10/3/2024. The following is a summary of what was provided in the Resolution Form:</p> <p>In response to CA #199031 requiring: "Properly dispose of oily waste in accordance with 905.e and, if applicable, report in accordance with 912." for "Heavy staining indicative of a containment failure observed at the footprint of the production tank. "</p> <p>-Operator states: "All stained soil has been removed. Please see attached picutres."</p> <p>-Corrective action outstanding. Operator statement in FIRR and attachment are not in compliance with Rule 207. Stained soil remains in situ as documented in this Inspection Form. ECMC Enforcement has been copied on this Inspection.</p> <p>In response to CA #199034 requiring: "Comply with Rule 606." for "Weeds observed throughout location"</p> <p>-Operator states: "Weeds have been removed from location. Please see attached picture. Same response applies for previous FIR #699505325."</p> <p>-Additional corrective action is required. Overgrown weeds have been removed; however, weeds remain on location as documented in this Inspection.</p> <p>In response to CA #199035 requiring: "Comply with Rule 606." for "Trash observed within berm."</p> <p>-Operator states: "Trash have been removed from location."</p> <p>-ECMC agrees - Corrective Action is complete.</p> <p>In response to CA #199036 requiring: "Comply with Rule 606." for "Unused equipment observed around pumpjack."</p> <p>-Operator states: "Unused equipment has been removed."</p> <p>-Corrective action required. Unused equipment remains on location as documented in this Inspection.</p> <p>In responses to CA #199037 requiring: "Properly dispose of oily waste in accordance with 905.e. Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e." for "Staining was observed around the wellhead and underneath the pumpjack engine."</p> <p>-Operator states: "Stained soil has been cleaned up and removed from location. Please see attached pictures."</p> <p>-Based on this inspection and photo documentation attached to FIRR Doc #403944678, ECMC agrees staining at the wellhead has been removed; however, staining beneath the pumpjack engine remains. Additional corrective Action is required.</p>	andersoln	10/30/2024

Attached Documents

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

Document Num	Description	URL
403976283	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767050
710100295	ECMC Soil Sampling Field Notes - Jordan 34-4 Crude Oil AST	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767036

710100296	ECMC Soil Sampling Field Observations Map - Jordan 34-4 Crude Oil AST	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767037
710100297	ECMC Table 900-3 Conversions - Jordan 34-4 Crude Oil AST	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767039
710100298	ECMC Soil Sampling Analytical Summary Table - Jordan 34-4 Crude Oil AST	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767040
710100299	ECMC Photo Log - Jordan 34-4 Wellhead and Tank Battery	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767041
710100300	ECMC Soil Height Comparison Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767042
710100301	ECMC Soil Sampling Laboratory Analytical Report - Jordan 34-4 Crude Oil AST	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767043
710100302	KPK FIR Resolution Form & Attachments	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6767045