

**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:

01/15/2025

Submitted Date:

01/28/2025

Document Number:

717100068

FIELD INSPECTION FORMLoc 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:

11 Number of Comments

6 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	
,		cogcc@kpk.com	All Inspections
Watzman, Ross		rwatzman@kpk.com	All Inspections
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason
Brown, Kari		kari.oakman@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
486562	SPILL OR RELEASE	AC			-	Sam Funakoshi A2	EI

General Comment:

ECMC Environmental Field Inspection Report Summary

Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully 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 ID: 486562

Spill Name: Sam Funakoshi A2

Remediation Project #: 38349

Flowline Facility ID: 476382

Reported Date of Discovery: 04/10/2024

Date of Inspection: 01/15/2025

Spill is located within or adjacent to:

-Bald Eagle Active Nest Site Qtr Mile HPH

-Bald Eagle Active Nest Site Half Mile HPH

-Wetlands

-Surface water

Current site status:

-Excavation remains open at the location with orange construction fencing.

-A segment of the flowline remains exposed within the excavation.

-Orange construction fencing does not fully encompass the perimeter of the excavation.

-No wildlife protection measures (e.g. netting) were observed.

-Frozen groundwater observed within the excavation.

-Potential salt crusting is visible within the excavation.

-Soil stockpile marked as "contaminated" on location; BMPs are inadequate.

-A liner was observed beneath the stockpile. However, the liner did not fully contain the E&P waste.

-Weeds observed in and around the excavation and on the stockpile.

-Trash remains on location.

See attached corrective actions. A Supplemental Form 19 is required.

LocationOverall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	No signage present at open excavation. Stockpiled soil is marked as "contaminated"		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		Date:	
Corrective Action:		Date:	

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds present at the time of previous inspection (Field Inspection Doc. # 710100261) remain on location.		
Corrective Action:	Comply with Rule 606. CA due date back listed per Field Inspection Doc. # 710100261.	Date:	09/18/2024
Type	TRASH		
Comment:	Trash present at the time of previous inspection (Field Inspection Doc. # 710100261) remains on location.		
Corrective Action:	Comply with Rule 606. CA due date back listed per Field Inspection Doc. # 710100261.	Date:	09/18/2024

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type	OTHER		
Comment:	Orange construction fencing installed around the open excavation does not encompass the entire perimeter of the excavation and is sagging. Excavation sidewalls have started to collapse. Fencing conditions noted at the time of previous inspection (Field Inspection Doc. # 710100261) remain unaddressed.		
Corrective Action:	Operator shall continuously monitor and maintain [BMPs] 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, depth of excavation, presence of ground or surface water, livestock, wind, etc. when sites are not attended. CA due date back listed per Field Inspection Doc. # 710100261.	Date:	09/12/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 486562 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 Active Nest Site Qtr Mile High Priority Habitat and <300' from surface water and a riverine wetland. No wildlife protection equipment (e.g. netting) has been installed at the open excavation.

Corrective Action: Operator shall install wildlife protection equipment and provide documentation of consult with CPW regarding the timeframe for work and recommendations for wildlife BMPs. Operator shall provide documentation via Supplemental Form 19/27.

Date: 09/25/2024

CA due date back listed per Field Inspection Doc. # 710100261.

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:	486562	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: A segment of the flowline has been exposed and soils removed from the location. Groundwater has frozen within the excavation. Potential salt crusting is visible within the excavation. Per COA on Form 19i/s Doc. # 403749640 and reiterated on Field Inspection Doc. #: "Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director." Spill remains open past 90 days. No Supplemental Form 19 has been received for Spill ID 486562 to date (as of 01/21/2025).

Corrective Action: Operator shall immediately submit a Supplemental Form 19 to request closure of the Spill with work proceeding under Remediation Project No. 38349. CA due date back listed as 90 days from the date of discovery.

Date: 07/08/2024

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: E&P Waste is stockpiled on location with inadequate BMPs.

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 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. Operator shall provide photo documentation of stockpile liner integrity via Form 19 or Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil has spilled outside containment Full Table 915-1 Contaminants of Concern.

Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

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

Document Num	Description	URL
404071953	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6892762
717100069	ECMC Photo Log - Sam Funakoshi A2	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6892751