

**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:

02/13/2025

Submitted Date:

02/25/2025

Document Number:

717100099**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Rollins, Grace 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1700 LINCOLN ST STE 4550City: DENVER State: CO Zip: 80203**Status Summary:**

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

**Findings:**9 Number of Comments3 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
,		cogcc@kpk.com	<a href="#">All Inspections</a>
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross		rwatzman@kpk.com	<a href="#">All Inspections</a>
Brown, Kari		kari.oakman@state.co.us	
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
478542	SPILL OR RELEASE	CL	02/11/2022		-	Cosslet A 9 Flowline	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. Photos attached to document site conditions.

Spill ID: 478542

Spill Name: Cosslet A 9 Flowline

Remediation Project #: 18952

Reported Date of Discovery: 11/10/2020

Dates of Inspection: 02/13/2025 and 02/24/2025

Spill is located within or adjacent to:

- Dacono Municipality
- Freshwater Emergent Wetlands
- Crop land

Site status as of 02/13/2025:

- Excavation remains open.
- Additional soil appears to have been removed since the previous inspection on 03/12/2024, Field Inspection Report Document # 697602293.
- Exposed flowlines are visible in the northeastern portion of the excavation.
- Gray and black petroleum hydrocarbon staining is visible in situ on multiple excavation sidewalls.
- Frozen groundwater is visible at the base of the excavation.
- Snow accumulation covers portions of the base of the excavation.
- Metal fencing and orange construction fencing partially surround the excavation, but do not fully encompass the perimeter of the excavation.
- Two monitoring wells with metal monuments were observed on location.
- Weeds were visible around and within the open excavation.
- A soil stockpile labeled "contaminated" was observed on location. A liner was present, but was partially covered in snow accumulation.
- Operator personnel were observed on location loading soil from the stockpile labeled "contaminated" into trucks.
- A strong petroleum hydrocarbon odor was observed when the soil stockpile labeled "contaminated" was disturbed.
- A second soil stockpile labeled "clean" was observed on location.
- Areas of soil with gray petroleum hydrocarbon staining and a petroleum hydrocarbon odor were observed within the soil stockpile labeled "clean" and its associated berm.
- On February 13, 2025, while onsite ECMC collected one soil sample (Stockpile-01) from the most visibly impacted material of the soil stockpile labeled "clean". The soil sample had a PID of 411.3. The sample was 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 the complete Table 915-1 Contaminants of Concern.
- The Laboratory Analytical Report and Analytical Summary Table for the ECMC soil sample are attached to this Inspection Report. Results indicate the concentrations of Total Petroleum Hydrocarbons (681.28 mg/kg) and multiple organic and metals Contaminants of Concern exceeded their respective Table 915-1 regulatory limits.

Site status as of 02/24/2025:

- Excavation remains open.
- Minimal additional soil appears to have been removed since the previous inspection on 02/13/2025.
- Operator personnel were observed on location continuing to excavate soil. Operator personnel indicated that the stockpiles observed at the time of the previous inspection on 02/13/2025 had been transported off-location for disposal.
- No backfilling appeared to have been conducted.
- A liner and berm were observed on location with a "contaminated" sign. The liner condition appeared adequate.
- Operator personnel indicated that newly excavated soil would be stockpiled on the liner labeled "contaminated".
- A petroleum hydrocarbon odor was observed when the soil within the excavation was disturbed.
- Exposed flowlines remain visible in the northeastern portion of the excavation.
- Gray and black petroleum hydrocarbon staining is visible in situ on multiple excavation sidewalls.
- Free product is visible on groundwater in the deeper portions of the excavation.
- Metal fencing/orange construction fencing partially surround the excavation, but continue not to fully encompass the perimeter of the excavation.
- Weeds remain around/within excavation.

See attached corrective actions. A Supplemental Form 27 is required and is 103 days past due as of the day of the inspection.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type

WEEDS

Comment:

Weeds were visible around and within the open excavation. CA due date backlisted per Field Inspection Report Document # 697602164

Corrective Action:

Comply with housekeeping Rule 606.

Date: 09/27/2023

Overall Good: ☐**Spills:**

Type

Area

Volume

In Containment: No

Comment:

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

Type

OTHER

Comment:

Metal fencing and orange construction fencing partially surround the excavation, but does not fully encompass the perimeter of the excavation.

Corrective Action:

Secure access to excavation in accordance with Rule 913.b.(5).B.i and ECMC Guidance 913.b.(5)B i-v.

Date: 03/22/2025

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:

Date:

Inspected Facilities									
Facility ID:	478542	Type:	SPILL OR	API Number:	-	Status:	CL	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: Remediation Project No. 18952 was created for remediation of the Cosslet A 9 Flowline spill. Excavation remains open. Additional soil appears to have been removed since the previous inspection on 03/12/2024, Field Inspection Report Document No. 697602293. Minimal additional soil appeared to have been removed between the inspections on 02/13/2025 and 02/24/2025. Operator personnel were observed on location continuing to excavate soil on 02/24/2025. Exposed flowlines are visible in the northeastern portion of the excavation. Gray and black petroleum hydrocarbon staining is visible in situ on multiple excavation sidewalls. Frozen groundwater was visible at the base of the excavation on 02/13/2025. Free product was observed on groundwater on 02/24/2025. Two monitoring wells with metal monuments were observed on location. Quarterly reporting was required under Remediation Project # 18952; the last Form 27 for this project was submitted 08/15/2024 (Document # 403884293).

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered. In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (90 days). Operator shall provide an updated Form 27 for Remediation Project No. 18952. Operator will provide notice to DJ Basin Environmental Supervisor Nikki Graber and to the ECMC Area EPS via email at least 48 hours prior to any excavation backfill activities on location.

Date: 02/26/2025

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: Other \_\_\_\_\_ Comment: Soil stockpile labeled "clean" \_\_\_\_\_

**Sample** Sample Type: SOIL GRAB

Time: \_\_\_\_\_ (MM/dd/yyyy hh:mm) GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

BTEx: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_

Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_

8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_

Other: \_\_\_\_\_

Comment: ECMC collected one soil sample (Stockpile-01) from the most visibly impacted material of the soil stockpile labeled "clean". The soil sample had a PID of 411.3.

**Waste Management:**

Type Management Condition GPS (Lat) (Long)

Oily Soil Piles Adequate \_\_\_\_\_

Comment: On 02/13/2024, a soil stockpile labeled "contaminated" was observed on location. A liner was present, but was partially covered in snow accumulation. Operator personnel were observed on location loading soil from the stockpile labeled "contaminated" into trucks. A strong petroleum hydrocarbon odor was observed when the soil stockpile labeled "contaminated" was disturbed.

On 02/24/2025, the previously observed stockpile had been removed. A liner and berm were observed on location with a "contaminated" sign. The liner condition appeared adequate. Operator personnel indicated that newly excavated soil would be stockpiled on the liner labeled "contaminated".

Corrective Action

Date: \_\_\_\_\_

Oily Soil Piles Inadequate \_\_\_\_\_

Comment:	On 02/13/2025, petroleum hydrocarbon odor and gray staining were observed within the soil stockpile labeled "clean" and its associated berm. ECMC collected one soil sample (Stockpile-01) from the most visibly impacted material of the soil stockpile labeled "clean". The soil sample had a PID of 411.3. The Laboratory Analytical Report and Analytical Summary Table for the ECMC soil sample are attached to this Inspection Report. Results indicate the concentrations of Total Petroleum Hydrocarbons, and multiple organic and metals Contaminants of Concern exceeded their respective Table 915-1 regulatory limits.	
	On 02/24/2025, the previously observed stockpile labeled "clean" had been removed. No backfilling appeared to have been conducted.	
Corrective Action:		Date: _____

**Spill/Remediation:**

Comment:		
Corrective Action:		Date: _____

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

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

Document Num	Description	URL
404105140	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932861">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932861</a>
717100104	ECMC Photo Log - 02.13.2025 - Cosslet A 9 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932856">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932856</a>
717100107	ECMC Soil Sampling Laboratory Analytical Report - Cosslet A 9 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932857">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932857</a>
717100108	ECMC Soil Sampling Analytical Summary Table - Cosslet A 9 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932858">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932858</a>
717100109	ECMC Photo Log - 02.24.2025 - Cosslet A 9 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932859">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6932859</a>