

**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:

02/26/2025

Submitted Date:

03/10/2025

Document Number:

710100346

FIELD INSPECTION FORM
 Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
 _____ Anderson, Laurel _____ 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:

8 Number of Comments

4 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
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Graber, Nikki		nikki.graber@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
478839	Flowline System	AC	06/06/2024		-	Facility 8	EI
485956	SPILL OR RELEASE	CL			-	Facility 8 @ Pehr 12-1	EI

General Comment:

This is an environmental inspection conducted on February 26, 2025, by ECMC Environmental Protection Specialist, Laurel Anderson, to document spill response and ongoing remediation activities at KP Kauffman's Facility 8 @ Pehr 12-1 Spill (Spill ID 485956/Remediation Project 35566) associated with the Facility 8 Flowline System (Facility ID 478839)

Date of Discovery 01/26/2024

Any corrective actions from previous inspections that have not been addressed are still applicable. Any comments/conditions of approval from previously denied/approved forms that have not been addressed are still applicable.

No Operator or contract personnel were on location at the time of inspection.

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

Observations:

Open excavation in Weld CR 23 right-of-way

Free product was previously observed on groundwater within open excavation

Hydrocarbon odor and hydrocarbon stained soil remains visible within the open excavation

Orange construction fencing has fallen and is inadequate

Unused equipment and trash were observed adjacent to and within the open excavation

Jersey barriers have been installed between the CR and a portion of the open excavation

Repaired/replaced portion of the flowline is sticking up out of the open excavation

LocationOverall Good: ☐

Emergency Contact Number:

Comment: No emergency contact information present at open excavation

Corrective Action:

Date: _____

Good Housekeeping:

Type	OTHER		
Comment:	Ongoing issue: Trash, debris, unused equipment, stained soil/vegetation		
Corrective Action:	Lack of maintenance/good housekeeping procedures - see above statement (see photos). Comply with Rules 606 and 1002.f.(2).D. CA due date backdated to 09/18/2024 when corrective action was first required.		Date: 09/18/2024

Overall Good: ☐

Spills:				
Type	Area	Volume		
PW/CO	Flow Line	>= 5 bbls		
Comment:	Failure of an off-location multiphase flowline resulted in a spill of unknown volume. Saturated soil and pooled fluids were observed over an approximate 10'x20' area within the drainage low between Weld County Road 23 and Kerr McGee Operating's Pehr Pooling Unit 1 tank battery. Stained soil remains insitu and is visible within the open excavation. Free product was observed on groundwater within the open excavation.			
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. CA Due date back dated to date of discovery.		Date:	01/26/2024

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Fencing/:				
Type	OTHER			
Comment:	Jersey barriers have been installed between the County Road and a portion of the open excavation. However, the site had an open excavation along flowline without effective or adequate means of excluding entry at time of inspection; Orange construction fencing has fallen and is inadequate. Adequate fencing has been required in previous inspections.			
Corrective Action:	Operator shall immediately install, repair and continuously monitor and maintain best management practices 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, traffic, depth of excavation, presence of ground or surface water, livestock, wind, etc.		Date:	04/13/2025

Equipment:			corrective date	
Type: Flow Line	#			
Comment:	Flowline repairs have been made; however, the flowline is arched in a loop above the ground within the open excavation. Repair flowlines to comply with Rule 1102.j. Contact ECMC Inspector with schedule of post repair pressure testing. Test to be witnessed by ECMC staff. Provide pressure testing charts for all (active) flowline(s) repaired; email to ECMC Inspector (See Rule 1102.o.).			
Corrective Action:			Date:	

Venting:

Yes/No

Comment:			
Corrective Action:		Date:	
Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Environmental

Spill/Remediation:

Comment:

Operator submitted Form 27i Doc #403748934 for Site Investigation and Remediation of Spill ID 485956 on 04/11/2024. ECMC conditionally approved the Form 27i on 5/29/2024 generating Remediation Project #35566. Operator has not submitted any Supplemental Form 27's for this remediation project.

Corrective Action:

In accordance with Rule 913.e.(3), quarterly reporting (90 days) is required for Remediation Projects. Operator is 195 days past due and has not submitted a Form 27s for the last three quarters. CA due date back dated to when the first Supplemental Form 27 was due.

Date:

08/27/2024

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
404121512	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6952577
710100347	2025_0226_Facility 8 @ Pehr_Photo Documentation	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6952575