

**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:

03/19/2025

Submitted Date:

03/21/2025

Document Number:

710100369

FIELD INSPECTION FORMLoc 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:

16 Number of Comments

12 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
Silver, Randy		randy.silver@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Binschus, Chris		chris.binschus@state.co.us	
Revas, Robbie		robbie.revas@state.co.us	
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason
,		cogcc@kpk.com	All Inspections
Mitchem, Katelyn		katelyn.mitchem@state.co.us	
Brown, Kari		kari.oakman@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240096	WELL	PR		OW	123-07884	LANSONS FARMS 1	PR
240200	WELL	PR		OW	123-07988	LANSONS FARMS 5	PR
240203	WELL	PR		OW	123-07991	LANSONS FARM 8	PR
240944	WELL	PR		OW	123-08732	LANSONS FARM 9	PR
240946	WELL	PR		GW	123-08734	LANSONS FARM 11	PR
447295	TANK BATTERY	AC			-	LANSONS FARMS BATTERY	EI
475986	OFF- LOCATION FLOWLINE	AC	02/05/2021		-	Wellhead Line	EI
487675	SPILL OR RELEASE	CL			-	Lanson Farms 15 Flowline	EI

General Comment:

ECMC environmental inspection of the KP Kauffman (Operator) facilities listed below and to determine progress on the Lanson Farms 15 Flowline Spill (Spill ID 487675/REM 37945). 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. A white crust/straining was observed throughout the area; Primarily along the access roads and parallel to and within irrigation ditches, Godding

Hollow stream and Sullivan Ditch. The source/cause of the white crust/staining is unknown.

Photos attached to document site conditions.

Current site status:

Lanson Farms 15 Flowline Spill (Spill ID 487675/REM 37945)

Pages 30, 33-40, 72-73 of Photo Documentation

-Date of Discovery: 8/19/2024

-Days since spill discovery: 214 days (as of 3/21/2025)

-Form 27i Approved: 11/21/2024

-Supplemental Form 27 due: 2/10/2025

-As of 3/21/2025 ECMC has not received a quarterly (90 day) Supplemental Form 27 for this remediation project. Operator is 30 days past due on quarterly reporting as of 3/21/2025.

-Photos attached to document site conditions at the time of inspection. No discernible change was observed since previous inspections (Doc Nos 710100254 and 710100286).

-A hydrocarbon sheen was previously observed on groundwater within the open excavation

-Stained soil remains in situ and is visible within the open excavation

-Liner beneath E&P Waste Stockpiled on location has been punctured and is not adequate

-Stormwater BMPs are not properly installed and inadequate

-Fencing around open excavation has fallen

Spill excavation is located:

Within the Town of Frederick

~70' from the mapped flowline

<45' from mapped wetlands

<55' from surface water (Godding Hollow Stream)

Lanson Farms Tank Battery (Facility ID 447295/Location ID 450409)

Pages 32,41-43,44-53,72-73 of Photo Documentation

-Previous Inspection Doc #710100202

-Good housekeeping required

-Trash/weeds/debris

-Leaking equipment/odor, stained soil (Pgs 52-53)

-Erosion off location to the west and southwest of the tank battery.

-300 bbl crude oil AST paint is peeling and tank beginning to rust (Pg 45)

-Signage has been installed at the partially buried concrete produced water vault (Pg 46)

LANSONS FARMS 1 WELL (API: 123-07884)

Pages 53-55 and 57-59 of Photo Documentation

-Stained soil at and around the wellhead

LANSONS FARMS 5 WELL (API: 123-07988)

-Page 7 of Photo Documentation

-Weeds/debris

-Signage rusted and illegible

LANSONS FARM 8 WELL (API: 123-07991)

-Pages 8-12 of Photo Documentation

-Producing at time of inspection (Pgs 8-10)

-Active leak, oil stained soil and oil soaked rag on top of casing collar. (Pgs 9-11)

-ECMC personnel called the posted Emergency Contact Number (303)825-4822 at 11:30 am, to notify the Operator of the active leak. Operator personnel transferred the call to Operations, Mani Silva, answered and indicated a pumper would be dispatched to the well.

-Darker soil observed in the section north of the well and access road. (Pg 11)

-White staining/crust along access road, weeds/debris (Pg 12)

-Signage rusted and illegible

LANSONS FARM 9 WELL (API: 123-08732)

Pages 64-68

-Producing at time of inspection

-Stained soil observed around casing (Pg 68)

-Pumping unit leaking at time of inspection/oil stained soil. (Pgs 64-68)

LANSONS FARM 11 WELL (API: 123-08734)

-Pages 1 & 2, 23-29 of Photo Documentation

-White staining/crust around wellhead access road and Godding Hollow Stream (Source/cause unknown). (Pages 1-2 & 23-29)

-Weeds (Pgs 1 & 2)

A pumper arrived at the Lanson Farms Tank Battery on location as ECMC was leaving. ECMC notified the pumper of the leak at the Lanson Farm 8 well and Facility 4 East Tank Battery AST. No other Operator or contract environmental personnel on location at the time of this field inspection.

References to the eastern ditch in attached photo documentation are referring to Sullivan Ditch.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	OTHER		
Comment:	Self-inspection, maintenance and good house keeping procedures and schedules. Trash, debris, unused equipment, weeds and stained soil observed at multiple locations. See Inspector Comments and attached Photo Documentation.		
Corrective Action:	Comply with Rules 606., 902.c., 1003.f. and 1002.f.(2)D. for self-inspection, maintenance, and good housekeeping procedures and schedules to facilitate identification of conditions that could cause breakdowns or failures of BMPs. These procedures shall include measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal practices. In conducting inspections and maintenance relative to stormwater runoff, operators shall consider seasonal factors, such as winter snow cover and spring runoff from snowmelt, to ensure site conditions and controls are adequate and in place to effectively manage stormwater.		Date: <u>04/04/2025</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
PW/CO	WELLHEAD			
Comment:	LANSONS FARMS 1 WELL (API: 123-07884) Stained soil at and around the wellhead. An unknown volume of fluid(s) have spill and saturated soil.			
Corrective Action:	Operator shall immediately control and contain spills/releases and investigate, clean up and document impacts per Rule 912. Note: For any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts [photo documentation of cleanup activities (before, during and after) and waste disposal manifests] to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules. For non-E&P waste: Handle waste in accordance with Rule 906 and conduct maintenance on equipment, cleanup stained material and review self inspection processes per Rule 1002.f.(2).D.			Date: <u>03/21/2025</u>
PW/CO	WELLHEAD			
Comment:	LANSONS FARM 9 WELL (API: 123-08732) was producing at time of inspection Minor stained soil observed around casing (See Equipment for leak at pumping unit leaking at time of inspection/oil stained soil)			
Corrective Action:	Operator shall immediately control and contain spills/releases and investigate, clean up and document impacts per Rule 912. Note: For any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts [photo documentation of cleanup activities (before, during and after) and waste disposal manifests] to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.			Date: <u>03/21/2025</u>
PW/CO	WELLHEAD			
Comment:	LANSONS FARM 8 WELL (API: 123-07991) was producing at time of inspection. Active leak, oil stained soil and oil soaked rag on top of casing collar. An unknown volume of liquids have spill and saturated soil below. ECMC personnel called the posted Emergency Contact Number (303)825-4822 at 11:30 am, to notify the Operator of the active leak. Operator personnel transferred the call to Operations, Mani Silva, answered and indicated a pumper would be dispatched to the well.			

Corrective Action:	Operator shall immediately control and contain spills/releases and clean up/report per Rule 912. Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts [photo documentation of cleanup activities (before, during and after) and waste disposal manifests] to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.	Date:	03/21/2025
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In Containment: No

Comment:

☒ Multiple Spills and Releases?

Fencing/:			
Type	OTHER		
Comment:	Orange construction fencing around the excavation has fallen.		
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.	Date:	03/21/2025

Equipment:			corrective date
Type: Pump Jack	#		
Comment:	LANSONS FARM 9 WELL (API: 123-08732) Pumping unit running and leaking at time of inspection staining pad and soil below.		
Corrective Action:	For non-E&P waste: Handle waste in accordance with Rule 906 and conduct maintenance on equipment, cleanup stained material and review self inspection processes per Rule 1002.f.(2).D. These procedures shall include measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal practices.	Date:	04/04/2025
Type: Other	#		
Comment:	Lanson Farms Tank Battery - An ongoing leak appears to be present near the transfer pump adjacent to the separator. Natural gas odor observed in the area, but could not be pinpointed due to high winds.		
Corrective Action:	Operator shall immediately control and contain spills/releases and investigate, clean up and document impacts per Rule 912.a. Note: For any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts [photo documentation (before, during and after) and waste disposal manifests] to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Operator shall 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.	Date:	03/21/2025

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLS	STEEL AST		,
Comment:	Paint peeling and 300-bbl steel crude oil AST beginning to rust				
Corrective Action:	Inspect, maintain and repair tanks to comply with Rule 609.b.				Date: 04/20/2025

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:					
Corrective Action:					Date:
<u>Venting:</u>					
Yes/No					
Comment:					
Corrective Action:					Date:
<u>Flaring:</u>					
Type					
Comment:					
Corrective Action:					Date:

Inspected Facilities

Facility ID: 240096	Type: WELL	API Number: 123-07884	Status: PR	Insp. Status: PR
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 240200	Type: WELL	API Number: 123-07988	Status: PR	Insp. Status: PR
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 240203	Type: WELL	API Number: 123-07991	Status: PR	Insp. Status: PR
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 240944	Type: WELL	API Number: 123-08732	Status: PR	Insp. Status: PR
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 240946	Type: WELL	API Number: 123-08734	Status: PR	Insp. Status: PR
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 447295	Type: TANK	API Number: -	Status: AC	Insp. Status: EI
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 475986	Type: OFF-	API Number: -	Status: AC	Insp. Status: EI
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 487675	Type: SPILL OR	API Number: -	Status: CL	Insp. Status: EI
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The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Environmental					
Waste Management:					
Type	Management	Condition	GPS (Lat) (Long)		
Oily Soil	Piles	Inadequate			
Comment	E&P waste has been stockpiled on location. The liner has been compromised (multiple punctures) and E&P was has been spilled/tracked outside of containment.				
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 the liner has been punctured and where impacted soil has been spilled/tracked outside containment for full Table 915-1 Contaminants of Concern.				Date:
Spill/Remediation:					
Comment:	Lanson Farms 15 Flowline Spill (Spill ID 487675/REM 37945) excavation extent is <45' from mapped wetlands and <55' from surface water (Goding Hollow Stream), depth to groundwater is ~1' bgs. Per Rule 912.b.(10) at the same time the Operator submits a Form 19i Operators are required to provide written and/or verbal notification to CPW if the Spill or Release occurred within 300 feet of surface Waters of the State. Operator notified CPW via email on 1/8/2025 (141 days late).				
Corrective Action:	As of 3/21/2025 ECMC has not received a quarterly (90 day) Supplemental Form 27 for this remediation project. Operator is 30 days past due on quarterly reporting as of 3/21/2025. CA due date back dated to when the Form 27s was due.				Date: 02/10/2025
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 SEGREGATION _____

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 **Ongoing issue. Lanson Farms Tank Battery (Facility ID 447295/Location ID 450409). Erosion has transported sediment and debris off location. Operator shall comply with ECMC Rule 1002.e. to minimize surface disturbance and Rule 1002.f.(2) for stormwater management.**

Corrective Action **Operator shall implement and maintain BMPs to comply with ECMC Rule 1002.e. and Rule 1002.f.(2). CA remains unaddressed - CA due date back dated to CA due date on Field Inspection Form Doc #710100202.**

Date **05/18/2024**

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:						Date _____
Corrective Action:						
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment:	<p>Ongoing issue. Lanson Farms 15 Flowline Spill (Spill ID 487675/REM 37945) Inadequate BMPs in place to control stormwater run-on and runoff. BMPs installed are inadequate. An oily sheen was observed on groundwater within the open excavation previously.</p>					Date: 09/17/2024
Corrective Action:	<p>Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Install BMPs in accordance with 1002.f.(2) to prevent runoff and completely contain impacts. CA remains unaddressed - CA due date back dated to CA due date on Field Inspection Form Doc #710100254.</p>					

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
710100370	2025_0319_Lanson Farms_Photo Documentation	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6969871