

**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:

04/01/2025

Submitted Date:

04/07/2025

Document Number:

717100127

FIELD INSPECTION FORMLoc ID 317719 Inspector Name: Rollins, Grace On-Site Inspection ☐ 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	
Anderson, Laurel		laurel.anderson@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections
,		cogcc@kpk.com	All Inspections
MacLaren, Joe		joe.maclaren@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Binschus, Chris		chris.binschus@state.co.us	
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
475477	OFF-LOCATION FLOWLINE	AC	10/14/2020		-	Wellhead Line 26SWSE	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. Operator personnel were onsite at the time of inspections. Photos attached to document site conditions.

Spill ID: 489684

Spill Name: Hazel McHale #2 Flowline

Flowline Facility ID: 475477

Reported Date of Discovery: 03/28/2025

ECMC conducted two inspections, on 04/01/2025 and 04/03/2025.

See attached map. Spill is located within or in close proximity to the following sensitive receptors:

- Residential buildings (~400 feet southwest, ~662 feet northwest)
- Wetlands (Riverine) (~25 feet south)
- Bald Eagle Active Nest Site Half Mile High Priority Habitat (within)

On Monday, 03/31/2025, the affected surface owner contacted both the CDPHE OEPR and ECMC Complaint line in response to a spill discovered by their children on their property on 03/28/2025; the spill was also reported via 911. The ECMC complaint alleges failure to properly consult and notify the affected surface owner and property damage to septic field. See attached photos for vehicle tracks and septic area.

Current site status, as of 04/03/2025:

- The excavation at the Spill location observed during ECMC inspection on 04/01/2025 has been enlarged and remains open.
- Gray to black staining is visible on the excavation sidewalls in contact with groundwater. Free product is visible on groundwater at the base of the excavation. A strong petroleum hydrocarbon odor was observed.
- The flowline previously observed within the excavation on 04/01/2025 has been partially removed; segments of flowline are visible protruding from the excavation sidewalls.
- Areas surrounding the Spill location had been scraped of vegetation and surficial soils. Areas of gray petroleum hydrocarbon staining were visible within the scraped area; a strong petroleum hydrocarbon odor was observed.
- Gray to black staining was visible within an unlabeled soil stockpile on location. A strong petroleum odor was observed downwind of the stockpile. A liner is visible, but has been driven over; BMPs are inadequate.
- Vehicular tracking/rutting was visible across a large surface area beyond the immediate vicinity of the Spill response area, including in proximity to the Surface Owner's septic field.

See attached corrective actions.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		

In Containment: No

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

Type	OTHER		
Comment:	Orange construction fencing partially surrounds the open excavation. Operator personnel were on location at the time of inspections. Per Complaint (Form 18 Doc. # 404150918), the spill was discovered by the children of the Reporting Party while playing in their yard.		
Corrective Action:	Operator shall install 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, depth of excavation, presence of ground or surface water, livestock, wind, etc.	Date:	03/28/2025

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location ConstructionLocation ID: 475477 CDP: _____

Comment: _____

Corrective Action: _____

Date: _____

Form 2A COAs:Comment: _____

Corrective Action: _____

Date: _____

Wildlife BMPs:Comment: Spill lies within a Bald Eagle Active Nest Site Half Mile High Priority Habitat. Groundwater has infiltrated the excavation. Per CPW, Operator consultation is ongoing.Corrective Action: Per CPW, Operator Biologist shall perform weekly checks on the proximate Bald Eagle Nest, as well as during noisy/busy periods and during cold weather. CPW has communicated to the Operator that work shall be conducted throughout weekends and cold weather; an expedited timeline to complete the work has also been requested by CPW.Date: 04/03/2025Operator shall comply with Rule 902.b to immediately install wildlife protection equipment (e.g. netting). CA due date backlisted to the date on which ECMC observed groundwater within the excavation.Comment: Spill is adjacent to and spill response and remediation activities are within jurisdictional Wetlands (Riverine) as mapped on the National Wetland Inventory Maps. Consultation with the US Army Corps of Engineers regarding compliance with Sections 401 and 404 of the Clean Water Act is recommended.Corrective Action: Install BMPs in accordance with 1002.f.(2) to prevent runoff and completely contain impacts around the spill footprint.Date: 03/28/2025**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:

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: The excavation at the Spill remains open. Gray to black staining is visible on the excavation sidewalls. Free product is visible on groundwater at the base of the excavation. A strong petroleum hydrocarbon odor was observed. The flowline previously observed within the excavation on 04/01/2025 has been partially removed; segments of flowline are visible protruding from the excavation sidewalls. Areas surrounding the Spill location had been scraped of vegetation and surficial soils. Areas of gray petroleum hydrocarbon staining were visible within the scraped area; a strong petroleum hydrocarbon odor was observed. In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered. All comments/COAs on Initial Form 19 Document # 404145889 remain applicable.

Corrective Action: _____

Date: _____

Reportable: ☐ YES

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: _____

Waste Management:

Type Management Condition GPS (Lat) (Long)

Oily Soil	Piles	Inadequate			
Comment	Oily waste is stockpiled on location. The majority of oily waste is stockpiled on liner; However, the perimeter berm surrounding the stockpile has been driven over and oily waste has spilled and spread outside of the lined area.				
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: _____

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

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 _____

Surface has been disturbed by spill response and remediation activities. Vehicular tracking/rutting was visible across a large surface area beyond the immediate vicinity of the Spill response area.

Corrective Action _____

Operator shall comply with Rule 913.b.(5).B.iii. to minimize surface disturbance. Operator shall comply with Rule 1003 to repair all rutting and complete reseeding using a seed mixture requested by the surface owner or a mixture prescribed by the local county NRCS; establish vegetation with total perennial, noninvasive uniform plant cover of at least eighty (80) percent of reference area levels; implement erosion controls to stabilize the seeded soil; and minimize dust. Operator shall continue to monitor and manage this site until the location meets Rule 1003 standards, including weed management.

Reclamation activities shall be complete as soon as environmental conditions will permit.

Date **03/28/2025**

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 _____

Corrective Action _____ Date _____

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: _____

Corrective Action: _____ Date _____

Overall Final Reclamation _____ Well Release on Active Location ☐ Multi-Well Location ☐

Attached Documents

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

Document Num	Description	URL
404156046	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993716
717100129	CDPHE OEPR_Report	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993708
717100145	ECMC Sensitive Receptors Maps_Hazel McHale #2 Flowline	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993709
717100146	ECMC Photo Log_4.1.2025_Hazel McHale #2 Flowline	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993710
717100148	ECMC Photo Log_4.3.2025_Hazel McHale #2 Flowline	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993711