

**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 FORM**

Loc ID 317719 Inspector Name: Rollins, Grace On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**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

**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	<a href="#">All Inspections</a>
,		cogcc@kpk.com	<a href="#">All Inspections</a>
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	<a href="#">Northeast Region Energy Liason</a>

**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.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

Overall Good:

<b>Spills:</b>				
Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

<b>Fencing/:</b>				
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: <u>03/28/2025</u>

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:

**Location Construction**

Location ID: 475477 CDP: \_\_\_\_\_

Comment:

Corrective Action:

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

**Form 2A COAs:**

**Comment:**

Corrective Action:

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

**Wildlife BMPs:**

**Comment:**

Corrective Action:

Date:

**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: 475477 Type: OFF- API Number: - Status: AC Insp. Status: EI

**Complaint**

Comment: Per ECMC complaint Document # 404119418, the affected surface owner alleges that the Operator had failed to provide notice of the Spill impacting their property. as well as potential damage to the Reporting Party's leach field.

Corrective Action: Operator shall comply with Rule 913.b.(5).B.iii. to minimize surface disturbance.

Date:

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**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:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**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 reseeded 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 REVEGETATION

Cropland

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	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993716">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993716</a>
717100129	CDPHE OEPR_Report	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993708">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993708</a>
717100145	ECMC Sensitive Receptors Maps_Hazel McHale #2 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993709">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993709</a>
717100146	ECMC Photo Log_4.1.2025_Hazel McHale #2 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993710">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993710</a>
717100148	ECMC Photo Log_4.3.2025_Hazel McHale #2 Flowline	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993711">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6993711</a>