

**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:

03/26/2025

Submitted Date:

04/14/2025

Document Number:

717100143**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:11 Number of Comments5 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
Binschus, Chris		chris.binschus@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
,		cogcc@kpk.com	All Inspections
Freese, Steve		steve.freese@state.co.us	Mineral Field Specialist

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. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Spill ID: 487984

Spill Name: Dechant State 3 Flowline

Remediation Project #: 39579

Flowline Facility ID: 475722

Reported Date of Discovery: 09/20/2024

Date of Inspection: 03/26/2025

Spill is located within State Land Board managed land

Current site status:

-Excavation remains open.

-Asymmetrical ripples are visible on the excavation floor. Petroleum hydrocarbon staining is visible in the center of the excavation floor.

-Soil has sloughed off excavation sidewalls.

-Segments of flowline are visible protruding from the excavation sidewalls.

-Orange construction fencing has been installed around portions of the excavation, but has fallen and does not fully encompass the excavation perimeter.

-Oily waste labeled "contaminated" is stockpiled on location. The majority of oily waste is stockpiled on liner; however, the liner is discontinuous and oily waste has spilled and spread outside of the lined area. BMPs are inadequate.

-Oily waste labeled "contaminated" is stockpiled in a second area 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. BMPs are inadequate.

-Two small soil stockpiles labeled "Clean" are visible immediately adjacent to stockpiled oily waste labeled "contaminated"; no BMPs installed.

See attached corrective actions.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: No emergency contact information present.

Corrective Action:

Date: _____

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type	OTHER		
Comment:	Orange construction fencing has been installed around portions of the excavation, but has fallen and does not fully encompass the excavation perimeter. As previously documented in Field Inspection Report Doc. # 710100288, per the landowner, either a three strand barbed wire fence or a hot wire fence that will completely exclude the livestock from any of the contaminated soils is required. Plastic "snow" fencing will not be sufficient to keep livestock away from the contaminated area.		
Corrective Action:	Operator has not complied with previous corrective actions nor Rule 913.b.(5)B.i and ECMC Guidance 913.b.(5)B i-v. Operator shall immediately install, repair 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/schools, depth of excavation, presence of ground or surface water, live stock, wind, etc. Corrective action due date backlisted per Field Inspection Report Doc. # 710100264.	Date:	09/25/2024

Equipment:

Type: Flow Line	#		corrective date
Comment:	Segments of flowline are visible protruding from the excavation sidewalls.		
Corrective Action:		Date:	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment:

Excavation remains open. Asymmetrical ripples indicate soil has been transported across the excavation floor by wind. Petroleum hydrocarbon staining is visible in the center of the excavation floor. Soil has sloughed off excavation sidewalls.

Corrective Action:

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.

Date: _____

Reportable: _____ 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: _____

Spill/Remediation:Comment:

Oily waste labeled "contaminated" is stockpiled in two areas on location. The majority of oily waste is stockpiled on liners; however, the liners are discontinuous and/or perimeter berms have been driven over, and oily waste has spilled and spread outside of the lined area. BMPs are inadequate. Two small soil stockpiles labeled "Clean" are visible immediately adjacent to stockpiled oily waste labeled "contaminated"; BMPs are inadequate.

Corrective Action:

Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts not previously submitted to the next Supplemental Form 27 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: _____

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 State Land Board has previously contacted the Operator to request installation of fencing around all O&G equipment on land owned by the State Land Board. The land board requested all fencing be constructed in a manner that is capable of preventing livestock entry; In order to prevent injury to livestock as well as avoid incidents where livestock damage O&G equipment creating a safety hazard.

Corrective Action Operator shall install fencing as soon as possible in accordance with Rule 1002.a. CA due date backlisted per Field Inspection Report Doc. # 710100288.

Date **10/31/2024**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 _____

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 ☐

Storm Water:

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

Comment:

Ongoing issue at Spill ID 487984: Inadequate BMPs in place to control stormwater run-on and runoff. Stained soil remains stored on location without adequate BMPs.

Corrective Action:

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. Corrective action backdated to Field Inspection Report Doc. # 710100264.

Date:

09/25/2024

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
717100149	ECMC Photo Log_Dechant State 3	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003530