

**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:

04/14/2025

Document Number:

717100139

**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:**

- 13 Number of Comments
- 8 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	
Silver, Randy		randy.silver@state.co.us	
Watzman, Ross		rwatzman@kpk.com	<a href="#">All Inspections</a>
,		cogcc@kpk.com	<a href="#">All Inspections</a>
Brown, Kari		kari.oakman@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Revas, Robbie		robbie.revas@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
489249	SPILL OR RELEASE	AC	02/18/2025		-	Hazel McHale - Separator	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. 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: 489249

Spill Name: Hazel McHale - Separator

Location ID: 317719

Date of Discovery: 01/02/2025

Date of Inspection: 04/01/2025

Spill is located approximately 35 feet from a Bald Eagle Active Nest Site Half Mile High Priority Habitat.

Current site status:

-No work appears to have been performed on this spill since the limited excavation on 02/06/2025, described in denied Form 19 Document Number 404099660; 02/21/2025).

-The area surrounding the Spill location has been excavated to approximately one foot below ground surface (bgs). The excavation remains open.

-Gray to black petroleum hydrocarbon staining is visible in situ in the area of Spill ID 489249. Petroleum hydrocarbon odor was observed when the stained soil was disturbed.

-Petroleum hydrocarbon staining is visible in an area separate from Spill ID 489249, beneath the west side of the separator; a petroleum hydrocarbon odor was observed when stained soil was disturbed.

-An unmarked soil stockpile is visible on location; no BMPs are installed.

-Fencing at the time of inspection is not adequate to restrict livestock. Livestock tracks are visible on and within the tank containment berm, which shares fencing with the separator area.

-Tufts of livestock fur are visible on the barbed wire stretched above a gap in the fencing.

-A fiberglass tank label has faded and is no longer legible.

-A strong petroleum hydrocarbon odor was observed immediately downwind of the tanks.

See attached corrective actions. A Supplemental Form 19 requesting closure of Spill ID 489249 was due 04/02/2025 and has not been received to date (as of 04/14/2025).

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	Sign not legible and not updated to reflect current Operator.		
Corrective Action:	Comply with Rule 605. CA due date backlisted per previous Field Inspection Report Doc. # 717100032.	Date:	<u>03/14/2025</u>
Emergency Contact Number:			
Comment:	Posted Operator Emergency Contact Number is (303) 825-4822. However, Operator has previously directed ECMC staff to call (303) 833-5670 instead of report emergencies.		
Corrective Action:	Operator shall confirm or update all signage with the desired Emergency Contact Number to comply with Rule 605. CA due date backlisted per previous Field Inspection Report Doc. # 717100032.	Date:	<u>02/09/2025</u>
<b>Good Housekeeping:</b>			
Type	DEBRIS		
Comment:	Debris is present within the tank containment fencing.		
Corrective Action:	Comply with Rule 606. CA due date backlisted per previous Field Inspection Report Doc. # 717100032.	Date:	<u>01/20/2025</u>
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
PW/CO	Separator	<= 1 bbl	
Comment:	Petroleum hydrocarbon staining is visible in an area separate from Spill ID 489249, beneath the west side of the separator; petroleum hydrocarbon odor was observed when stained soil was disturbed.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e and, if applicable, report in accordance with 912. 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: <u>05/14/2025</u>
In Containment: No			
Comment: <input style="width: 100%;" type="text"/>			
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Fencing/:</b>			
Type	TANK BATTERY		
Comment:	Per previous Field Inspection Report Doc. # 717100032: Surface owner has requested existing fencing be repaired to prevent livestock access to the facility and spill location. Fencing around the tank containment, ancillary equipment, separator and spill location is in poor condition and open.  Current status: Livestock tracks are visible on and within the tank containment berm, which shares fencing with the separator area. Per comments on Form 19 Doc. # 404128467, Operator indicates that the potential cause of this spill was livestock damage. Fencing at the time of inspection is not adequate to restrict livestock.		
Corrective Action:	Comply with Rule 1002. CA backdated to 5 days following ECMC's receipt of complaint in which notification to the Operator was reported (Form 18 Document Number 404048198).  In accordance with Rule 901.a operator shall immediately install fencing to prevent additional spills.		Date: <u>01/07/2025</u>
<b>Venting:</b>			
Yes/No			
Comment:	A strong petroleum hydrocarbon odor was observed immediately downwind of the tanks.		

Corrective Action:		Date:	
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**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 489249 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

**Complaint**

Comment: See Form 18 Document Number 404048198 and Form 19 Document Number 404128467, fencing adequate to restrict cattle is required at this location.

Corrective Action: Repair fencing to comply with Rule 1002.

Properly dispose of oily waste in accordance with 905.e and report in accordance with 912.

CA remains applicable and has been backdated to 24 hours following ECMC's receipt of complaint in which notification to the Operator was reported (Form 18 Document Number 404048198).

Date: 01/03/2025

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

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: No work appears to have been performed on this spill since the limited excavation on 02/06/2025, described in denied Form 19 Document Number 404099660; 02/21/2025). The area surrounding the Spill location has been excavated to ~1ft bgs. The excavation remains open. Gray to black petroleum hydrocarbon staining is visible in situ. Petroleum hydrocarbon odor was observed when the stained soil was disturbed.

Corrective Action: Properly dispose of oily waste in accordance with 905.e. Pursuant to Rule 912.b.(6), a Supplemental Form 19 requesting closure of Spill ID 489249 was due 04/02/2025 and has not been received to date (as of 04/14/2025). If remediation of Spill ID 489249 has not been completed, an Initial Form 27 is required.

Date: 04/28/2025

Reportable: \_\_\_\_\_ 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)	
	Piles	Inadequate			
Comment	<span style="color: blue;">An unmarked soil stockpile is visible on location; no BMPs are installed.</span>				
Corrective Action	<span style="color: red;">Operator shall comply with Rule 913.b.(5).B.iv. and properly store, handle, and manage all E&amp;P Waste to prevent contamination of stormwater, surface water, Groundwater, and soil.</span>			Date:	<u>04/28/2025</u>

**Spill/Remediation:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**ECMC Comments**

Comment	User	Date
<span style="color: blue;">Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable.</span>	rollinsg	04/02/2025

**Attached Documents**

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

Document Num	Description	URL
717100150	ECMC Photo Log - Hazel McHale Separator	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003681">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003681</a>