

**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: _____**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:13 Number of Comments8 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	
,		cogcc@kpk.com	All Inspections
Brown, Kari		kari.oakman@state.co.us	
Revas, Robbie		robbie.revas@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections
Graber, Nikki		nikki.graber@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).

LocationOverall Good: ☐

Signs/Marker:			
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:	03/14/2025

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:	02/09/2025

Good Housekeeping:

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:	01/20/2025

Overall Good: ☐

Spills:				
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: 05/14/2025

In Containment: No

Comment: ☐ Multiple Spills and Releases?

Fencing/:			
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:	01/07/2025

Venting:

Yes/No			
Comment:	A strong petroleum hydrocarbon odor was observed immediately downwind of the tanks.		

Corrective Action:		Date:	
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:

Lat _____

Long _____

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
	Piles	Inadequate		
Comment	An unmarked soil stockpile is visible on location; no BMPs are installed.			
Corrective Action	Operator shall comply with Rule 913.b.(5).B.iv. and properly store, handle, and manage all E&P Waste to prevent contamination of stormwater, surface water, Groundwater, and soil.			Date: 04/28/2025

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

ECMC Comments

Comment	User	Date
Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable.	rollinsg	04/02/2025

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

Document Num	Description	URL
404163629	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003697
717100150	ECMC Photo Log - Hazel McHale Separator	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003681