

**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:

05/13/2025

Submitted Date:

05/15/2025

Document Number:

697602492**FIELD INSPECTION FORM**Loc ID 311281 Inspector Name: Ahmadian, Alexander 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:10 Number of Comments6 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	
,		cogcc@kpk.com	All Inspections
Rollins, Grace		grace.rollins@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
475477	OFF-LOCATION FLOWLINE	AC			-	Wellhead Line 26SWSE	EI
489684	SPILL OR RELEASE	AC	04/17/2025		-	Hazel McHale #2 Flowline	EI

General Comment:

ECMC Environmental Inspection in response to Complaint Document #404150918 and to determine progress on the Hazel McHale #2 Flowline (Spill ID 489684). Any corrective actions from previous inspections, forms, or orders that have not been 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: 489684

Spill Name: Hazel McHale #2 Flowline

Flowline Facility ID: 475477

Reported Date of Discovery: 03/28/2025

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.

On Friday, 05/09/2025, the affected surface owner contacted ECMC EPS Alex Ahmadian with concerns about the remediation progress on site. The surface owner alleges that the Operator KPK had not been to the site in two weeks and had not been returning the surface owner's calls. The surface owner is concerned regarding the progress and safety of the ongoing remediation project due to an upcoming event where many guests will be parking on the property. The surface owner has expressed concerns about the potential dangers due to the large excavation left open at the site, and fencing that has fallen to prevent access to the excavation. The contaminated stockpile has been left on site and the surface owner is concerned about children attempting to climb or play in the contaminated soil stockpile.

On Tuesday, 05/13/2025, ECMC EPS Alex Ahmadian and Kilian Collins inspected the site and observed the site conditions. The excavation at the Spill location has been enlarged and remains open. Groundwater is visible at the base of the excavation. The orange fencing surrounding the excavation has fallen in multiple areas creating a potential safety liability. Gray to black staining was visible within a labeled 'contaminated' soil stockpile on location. A strong petroleum odor was observed downwind of the stockpile. A liner is visible, but has been driven over and soil is overflowing from the top of the stockpile to the unlined ground. A drainage trench has been dug to prevent soil runoff but is inadequate due to its location. The trench is not close enough in proximity to the stockpile to prevent soil runoff; BMPs are inadequate. Vehicular tracking/rutting was still 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.

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. The fencing is falling in multiple areas and does not prevent access to the excavation. This is a threat to public safety due to the close proximity of the excavation to the residence. (Photolog P. 2,4)		
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. More sturdy, reliable fencing is requested at the site if the excavation is to remain open. This is a recurring issue that remains unaddressed from previous inspections. CA due date backlisted to the date on which ECMC first observed issues with the fencing.	Date: 03/28/2025	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 489684 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. Operator shall comply with Rule 902.b to immediately install wildlife protection equipment (e.g. netting). This is a recurring issue that remains unaddressed from previous inspections.**Date:** 04/03/2025

CA due date backlisted to the date on which ECMC observed groundwater within the excavation. CA has yet to be addressed.

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. The trench (Photolog P.10) previously dug by the Operator to prevent stormwater runoff is inadequate in preventing runoff from the stockpile. This is a recurring issue that remains unaddressed from previous inspections.**Date:** 03/31/2025

CA due date backlisted to the date in which ECMC initially observed the stockpile on location.

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**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Comment	Oily waste is stockpiled on location. The majority of oily waste is stockpiled on a liner; However, the perimeter berm surrounding the stockpile has been driven over and oily waste has spilled and spread outside of the lined area. This is a recurring issue that remains unaddressed from previous inspections. (Photolog P. 5-9)			
Corrective Action	<p>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).</p> <p>Additionally, Operator shall manage waste in compliance with Rule 913.b.(5)B and ECMC Guidance 913.b.(5)B i-v. If stockpile is to remain while unattended, Operator shall immediately install security measures adequate to restrict public from accessing. Operator shall provide photo documentation of stockpile liner integrity via Form 19 or Form 27 prior to removal.</p> <p>Operator shall collect soil samples from the areas where impacted soil has spilled outside containment Full Table 915-1 Contaminants of Concern.</p>			Date: 05/19/2025

Spill/Remediation:

Comment:	The excavation at the Spill remains open (Photolog P. 1-4). Gray to black staining is visible on the excavation sidewalls. Groundwater was observed 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.		
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. All comments/COAs on all previous forms and inspections remain applicable.		
			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 _____

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 ☐

ECMC Comments

Comment	User	Date
<p>Given the proximity to the residence, it is imperative that immediate action is taken to ensure the safety of all individuals on the property. ECMC requires the immediate implementation of safety measures to mitigate risks surrounding the remediation project including, but not limited to, the installation of secure fencing around all hazardous areas, covering and fencing the open excavation or potential trip hazards, removing the contaminated stockpile, and marking any remaining areas of concern with highly visible warning signs.</p> <p>ECMC takes these safety concerns very seriously. We expect the Operator's immediate attention to this matter and a prompt response to the risks associated with the remediation project. Failure to adequately address these safety concerns in a timely manner may necessitate further action by the ECMC.</p> <p>ECMC confirmed on 5/15/2025 at 13:30 PM that no crews were on location and no additional remediation had been conducted.</p>	ahmadiiaa	05/15/2025

Attached Documents

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

Document Num	Description	URL
404206934	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7052006
697602494	Photolog	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7051987