

**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:

05/22/2025

Submitted Date:

06/09/2025

Document Number:

697602541

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: Ahmadian, Alexander 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:

- 18 Number of Comments
- 12 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
Watzman, Ross		rwatzman@kpk.com	All Inspections
Kirschner, Steven		steven.kirschner@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
,		cogcc@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240350	WELL	SI		GW	123-08138	FIRECRACKER UNIT 1	EI
317998	LOCATION	AC			-	FIRECRACKER UNIT-61N68W 12SWNW	EI
478834	Flowline System	AC	12/17/2020		-	Facility 4 North	EI
478835	Flowline System	AC			-	Facility 4 South	EI
484440	SPILL OR RELEASE	CL			-	Firecracker Tank Battery	EI

General Comment:

ECMC environmental inspection to determine progress on Firecracker Tank Battery Spill ID 484440/Remediation 36216. 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.

Incident information:

Spill Discovery Date: 5/4/2022
Days since spill discovery: 1,113 days
Last report: 08/27/2024. Form 19 Document #403890422

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	WELLHEAD		
Comment:	Wellhead signage is faded and has fallen from the pumpjack (P.17).		
Corrective Action:	Install sign to comply with Rule 605.g. CA originally issued on Inspection Document #710100034 on 06/05/2023.	Date:	07/05/2023
Type	OTHER		
Comment:	Location entrance and tank battery signage has been replaced and is adequate.		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:	No warning/hazard signage present at open excavations.		
Corrective Action:		Date:	
Good Housekeeping:			
Type	WEEDS		
Comment:	Weeds overgrown throughout the entire location including in and around the remediation excavation.		
Corrective Action:	Comply with Housekeeping Rule 606. CA originally issued on Inspection Document #710100034 on 06/05/2023.	Date:	06/19/2023
Type	OTHER		
Comment:	Stained soil/trash/debris/unused equipment (P.1,8,11,13). Stained soil has been tracked throughout the location and off location (P.5).		
Corrective Action:	Comply with Rules 606., 902.c., and 1002.f.(2)D. CA originally issued on Inspection Document #710100034 on 06/05/2023.	Date:	06/19/2023
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Excavation fencing is comprised of metal cattle fencing. A portion of the fence on the East side has begun to fall and requires repair. Signs of livestock were observed throughout the location (P.12).		
Corrective Action:	Operator shall immediately install, repair and maintain BMPs 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 Fencing used must be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, etc. CA originally issued on Inspection Document #710100096 on 11/29/2023.	Date:	11/30/2023
Type	PUMP JACK		
Comment:	Barbed wire fencing surrounding the pumpjack has fallen (P.17).		

Corrective Action:	Comply with the fencing requirements per the 1002a and 603 rules	Date:	06/16/2025
Equipment:		corrective date	
Type: Flow Line	#		
Comment:	Multiple flowlines of unknown status were observed exposed within the open excavation (P.1-4).		
Corrective Action:	Comply with ECMC 1105 series Rules for Abandonment; Repair all active flowlines intended for return to service; or Historically abandoned/ out of service flowlines exposed in the excavation must be abandoned per ECMC Rule 1105 (ends sealed per 1105.e.4). Provide confirmation documentation of completion (photos) to ECMC Integrity Inspector and Engineer.		Date:
			06/19/2023

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient		Inadequate
Comment:				
Earthen berms surrounding the tanks and separator inadequate at containing spills of the tanks' capacity. The sidewalls of the berms are not high enough and have been comprised by weeds and poor maintenance (P.13,15).				
Corrective Action:				Date:
Repair or install berms or other secondary containment devices per Rule 912.d.(1).				06/29/2025

Venting:

Yes/No	
Comment:	
Corrective Action:	Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities

Facility ID: 240350 Type: WELL API Number: 123-08138 Status: SI Insp. Status: EI

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

Facility ID: 317998 Type: LOCATION API Number: - Status: AC Insp. Status: EI

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

Facility ID: 478834 Type: Flowline API Number: - Status: AC Insp. Status: EI

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

Facility ID: 478835 Type: Flowline API Number: - Status: AC Insp. Status: EI

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

Facility ID: 484440 Type: SPILL OR API Number: - Status: CL Insp. Status: EI

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 last Form 27 Supplemental was submitted on 05/14/2024. Operator has not submitted a Form 27 within the approved quarterly reporting schedule and Rule 913.e.(3); the next quarterly report was due 08/12/2024. A Form 19 Document #403890422 was submitted on 08/27/2024 moving the Spill to Remediation Project #36216. Operator was required to submit the Form 19 within 90 days of spill discovery (August 2, 2023). The Form 19 was submitted 391 days late.

Corrective Action: Operator shall immediately submit a Form 27 for Spill ID 484440/Remediation Project 36216 that includes a specific workplan and timeline to address the remaining impacts. Date: 08/12/2024

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)
Oily Soil	Other	Inadequate	
Comment	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905. Impacted soil is being stockpiled on location with inadequate BMP's (liner torn throughout and berm is not continuous). Stockpile liner has been torn and comprised completely at the stockpile location (P. 5-9)		
Corrective Action	Immediately remove oily waste and properly dispose in accordance with 905.e. Document removal of oily waste on Supplemental Form 27. Manage stockpiles in compliance with Rule 1002.(c). Manage waste in compliance with Rule 913.b. (3) and ECMC Guidance 913.b.(5)B.i-v.		Date: <u>06/06/2023</u>
CA originally issued on Inspection Document #710100034 on 06/05/2023.			

Spill/Remediation:

Comment: Remedial excavation remains open. Groundwater including wildlife (turtles, frogs, fish) was observed within the excavation. Stained oily soil was observed in contact with the groundwater along the flowline within the excavation. Vegetation in clusing weeds has completely engulfed the remediation location. No remediation was observed to be completed since the last field inspection. (P. 1-5).

Corrective Action: Operator shall provide 48 hour notice to ECMC Area Environmental Protection Specialist prior to any sampling, excavation, backfill or soil boring/monitoring well installation on location. Date: 06/06/2023

In accordance with 913.d.(1) Operator will investigate impacts to soil, groundwater and surface water as soon as the impacts are discovered.

Additionally, pursuant to Rule 902.c., Operator will prevent the unauthorized discharge or disposal of oil, condensate, gas, E&P Waste, Chemical substances, trash, discarded equipment, and other oil field waste.

CA(s) originally issued on Inspection Document #710100034 on 06/05/2023.

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 [Operator has created an excessive footprint and formed an additional access road across the property adjacent to the tank battery \(P. 5-8\).](#)

Corrective Action [Operator shall comply with ECMC 1002.e. Rules for Surface disturbance minimization. CA originally issued on Inspection Document #710100096 on 11/29/2023.](#)

Date **12/13/2023**

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

Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: No stormwater BMPs have been installed on location to prevent run-on/off into the open excavations and off location.</p> <p>Corrective Action: Operator shall install BMPs in accordance with 1002.f.(2) to prevent erosion, run-on/off into the open excavation and off location.</p> <p>CA originally issued on Inspection Document #710100034 on 06/05/2023.</p>						Date: 06/12/2023
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

ECMC Comments		
Comment	User	Date
Site conditions are extremely poor and neglected. None of the CAs from the last FIR Document #10100096 have been addressed. The excavation has remained opened and wildlife has been observed within the groundwater of the excavation.	ahmadiia	06/09/2025

Attached Documents

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

Document Num	Description	URL
697602542	Photolog	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7088058