

**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:

04/20/2025

Submitted Date:

06/06/2025

Document Number:

697602535**FIELD INSPECTION FORM**Loc ID 479010 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:**11 Number of Comments7 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
,		cogcc@kpk.com	All Inspections
Kirschner, Steven		steven.kirschner@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Anderson, Laurel		laurel.anderson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479011	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
479012	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
479013	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
479014	OFF-LOCATION FLOWLINE	AC	01/04/2021		-	Wellhead Line	EI
480343	SPILL OR RELEASE	CL	01/13/2023		-	UPRR 42 Pan Am F #4	EI

General Comment:

ECMC Environmental Inspection to determine progress on UPRR 42 Pan Am F #4 (Spill ID 480343/ Remediation 25934). 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: 7/29/2021Days since spill discovery: 1,391 daysLast report: 12/20/2022

LocationOverall Good: ☐

Emergency Contact Number:

Comment: No signage at open excavation.

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Ongoing Issue: Weeds present throughout work area and within open excavation.		
Corrective Action:	Comply with Rules 606.c. and 1003.f. Ongoing Issue: CA was originally issued on Inspection Document #689501444 on 11/7/2023.		Date: 11/14/2023
Type	TRASH		
Comment:	Trash including ripped fencing, ripped liner, bottles, etc. are scattered throughout the site including in and around the excavation.		
Corrective Action:	Comply with Housekeeping Rule 606.		Date: 06/13/2025

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type	OTHER		
Comment:	Ongoing issue: Fencing not adequate to protect the environment, public health, safety and welfare and the environment. Fencing is torn, sagging and has gaps. Animal tracks were observed within the base of the open excavation. Excavation extent is <30' from the County Road.		
Corrective Action:	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, roads, depth of excavation, presence of ground or surface water, livestock, wind, etc. Ongoing Issue: CA was originally issued on Inspection Document #689501444 on 11/7/2023.		Date: 11/14/2023

Equipment:

Type: Flow Line	#		corrective date
Comment:	Multiple flowlines of unknown status were observed exposed within the open excavation.		
Corrective Action:	Comply with ECMC 1100 Series Rules -Repair all flowlines intended for return to service per Rule 1102.j. -For shut-in or out of service off-location flowlines or crude oil transfer lines, Operator shall comply with Rule 1102.o. -For flowlines being abandoned, Operator shall comply with ECMC Rule 1105 -Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per Rule 1102.j.7 (at well ASAP/second endpoint/facility prior to and during repair). -Historically abandoned/out of service flowlines exposed in the excavation must be abandoned per ECMC Rule 1105 (ends sealed per Rule 1105.e.4). -Provide documentation of completion to ECMC Integrity Inspector and Engineer.		Date: 08/28/2024

Type: Flow Line	#		
Comment:	Flowlines appear to have been replaced with ~3" HDPE flowline pipe at the surface.		
Corrective Action:	<p>Operator shall make repairs and install flowlines to comply with Rule 1102.e. which requires all installed flowlines and crude oil transfer lines have cover sufficient to protect them from damage. On cropland, all flowlines must have a minimum cover of three (3) feet.</p> <p>Notify area EPS and ECMC Integrity Inspector and Engineer 48 hours prior to conducting work. Provide ECMC Ingetgrity Inspector and Engineer photo documentation of work.</p> <p>Ongoing Issue: CA was originally issued on Inspection Document #710100233 on 07/29/2024.</p>		Date: 08/28/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Ongoing: Remediation excavation remains open. No water was observed within the excavation. No work has been done since the last inspection.

Corrective Action: Repeat CA: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water 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: See previous FIRs.
Ongoing issue: Quarterly reporting is required for Remediation Project #25934. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on December 20, 2022 (Doc #403253747).

Corrective Action: Repeat CA. See previous FIRs.
In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (every 90 days). Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated.

Operator shall immediately submit a Form 27 for Spill ID 480343 that includes a specific workplan and timeline to address the remaining impacts.

This location was included in NOAV # 403513701 for violation of Rule 913.e.(3). CA originally issued on Inspection Document #689501444 on 11/7/2023. Date: 03/23/2023

Emission Control Burner (ECB): _____

Comment: _____

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

ECMC Comments

Comment	User	Date
This was a follow-up inspection to determine progress on (Spill ID 480343/ Remediation 25934). Multiple CAs remain unaddressed through several inspections at the site. No progress has been made at the site since the last inspection. Site conditions are poor and neglected.	ahmadiiaa	06/06/2025

Attached Documents

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

Document Num	Description	URL
404232531	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7085544
697602536	Photolog	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7085539