

**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:

05/20/2025

Submitted Date:

06/06/2025

Document Number:

697602539

**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

**Findings:**

11 Number of Comments

5 Number of Corrective Actions

Corrective Action Response Requested

**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

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
Kirschner, Steven		steven.kirschner@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
,		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
474780	SPILL OR RELEASE	CL			-	Cosslett #3	EI

**General Comment:**

ECMC environmental inspection to determine progress on Cosslett #3 (Spill ID 474780/Remediation 15825). 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: 9/25/2021  
Days since spill discovery: 1,334 days  
Last report: 11/3/2022

Location			
<b>Lease Road:</b>			
Type	Access		
comment:			
Corrective Action		Date:	
Overall Good: <input type="checkbox"/>			
<b>Emergency Contact Number:</b>			
Comment:	No signage at the excavation.		Date:
Corrective Action:			
<b>Good Housekeeping:</b>			
Type	TRASH		
Comment:	Comply with Housekeeping Rule 606.		
Corrective Action:		Date:	
Type	WEEDS		
Comment:	Weeds are growing all around the site including within and around the remedial excavation.		
Corrective Action:	Comply with Housekeeping Rule 606.		Date: 06/13/2025
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Fencing/:</b>			
Type	OTHER		
Comment:	Excavation fencing has ripped or fallen.		
Corrective Action:	Operator shall immediatiately 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.		Date: 06/13/2025
<b>Equipment:</b>			
Type: Flow Line	#		corrective date
Comment:	Historically abandoned and out of service flowline is exposed within the excavation.		
Corrective Action:		Date:	
<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:		Date:	
<b>Flaring:</b>			
Type			
Comment:			

Corrective Action:

Date:

**Inspected Facilities**

Facility ID: 474780 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: Remediation excavation remains open. No water was observed within the excavation. No work has been done since the last inspection.

Corrective Action: 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: 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: 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 474780 that includes a specific workplan and timeline to address the remaining impacts.

Date: 03/20/2023

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

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

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

**Reclamation - Storm Water - Pit**

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Tracking pad not adequately maintained to prevent track of material offsite. Gravel has not been maintained. Fence posts are still onsite.

Corrective Action: Maintain vehicle tracking BMPs on the oil and gas location to comply with rule 1002.f.(2)F. Additionally, if material is tracked onto county or public roads, contact the appropriate authority.

Date: 07/06/2025

**Pits:**  NO SURFACE INDICATION OF PIT

**ECMC Comments**

Comment	User	Date
<span style="color: blue;">Site conditions are poor. Location is in close proximity to residences. Fencing around the excavation is not adequate and is a threat to public safety. We advise the Operator to address these safety concerns as soon as possible.</span>	ahmadiaa	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
404232533	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7085546">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7085546</a>
697602540	Photolog	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7085541">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7085541</a>