

**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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
,		cogcc@kpk.com	<a href="#">All Inspections</a>
Graber, Nikki		nikki.graber@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Watzman, Ross		rwatzman@kpk.com	<a href="#">All Inspections</a>

**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

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	Location entrance and tank battery signage has been replaced and is adequate.		
Corrective Action:		Date:	
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: <u>07/05/2023</u>
Emergency Contact Number:			
Comment:	No warning/hazard signage present at open excavations.		
Corrective Action:			Date: _____
<b>Good Housekeeping:</b>			
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: <u>06/19/2023</u>
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: <u>06/19/2023</u>
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 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: <u>11/30/2023</u>
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
<b>Equipment:</b>		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.  CA originally issued on Inspection Document #710100034 on 06/05/2023.				Date: <u>06/06/2023</u>

**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.  
  
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. Date: 06/06/2023

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

<b>Storm Water:</b>						
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><b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

<b>ECMC Comments</b>		
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
404234118	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7088059">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7088059</a>
697602542	Photolog	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7088058">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7088058</a>