

**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:

05/27/2025

Submitted Date:

07/10/2025

Document Number:

718300022**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Anderson, Laurel 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:14 Number of Comments8 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
Brown, Kari		kari.oakman@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Rollins, Grace		grace.rollins@state.co.us	
Freese, Steve		steve.freese@state.co.us	CO SLB - Mineral Field Specialist
,		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Binschus, Chris		chris.binschus@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240209	WELL	SI		OW	123-07997	DECHANT-STATE 3	SI
475722	OFF- LOCATION FLOWLINE	AC	01/07/2021		-	Wellhead Line 1,2,3,4,5,6,7	EI
487984	SPILL OR RELEASE	CL			-	Dechant State 3 Flowline	EI

General Comment:

On May 27th, 2025, ECMC Environmental Protection Specialist Laurel Anderson performed a routine environmental inspection to determine progress on KP Kauffman's Company Inc's (Operator) Dechant State 3 Flowline spill (Spill ID 487984/REM 39579). Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully 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.

Multiple Corrective Actions from previous Field Inspection Reports (FIRs) remain outstanding.

FIRs Doc Nos:

-710100264 - Date of inspection: 9/23/2024

-710100288 - Dates of inspection: 10/10 & 10/15/2024

-717100143 - Date of inspection: 3/26/2025

Spill ID: 487984

Spill Name: Dechant State 3 Flowline

Remediation Project #: 39579

Flowline Facility ID: 475722

Related Wellhead: DECHANT-STATE 3 (API 123-07997)

Reported Date of Discovery: 09/20/2024

Days since Date of Discovery (as of 5/27/2025): 249

Date of Inspection: 05/27/2025

Spill is located within State Land Board managed land and the land leased for livestock grazing

Spill is located ~700' from mapped freshwater emergent wetlands and ~1,000' from mapped surface water and riverine wetlands

Wells completed in the Type III (alluvial) aquifer nearby (DWR Water Well Permit ID 4002029-DW located ~1,750' SW at similar elevation) have reported depth to groundwater at 20' below ground surface (bgs).

Current site status:

-Excavation remains open.

-Petroleum hydrocarbon staining is visible in the center of the excavation floor.

-Wind erosion and stormwater run-in/runoff have transported sediment and E&P waste.

-Wind erosion and stormwater run-in to the open excavation has resulted in rill erosion, sidewall destabilization and transport and accumulation of sediment (colluvium) within the open excavation.

-Soil has sloughed off excavation sidewalls.

-Asymmetrical ripples indicative of wind erosion (sediment transport and deposition) are visible on the excavation floor.

-Oily E&P waste labeled "contaminated" is stockpiled on location. The majority of oily waste is stockpiled on a liner; however, the liner is discontinuous and oily waste has spilled and spread outside of the lined area. BMPs are inadequate.

-Oily E&P waste labeled "contaminated" is stockpiled in a second area 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. BMPs are inadequate.

-E&P waste stockpiles are showing signs of erosion and sediment transport/deposition on top and outside of containment

-Orange construction fencing has been installed around portions of the excavation, but has fallen and does not fully encompass the excavation perimeter. Orange construction fencing is not appropriate for site conditions as it does not encompass the perimeter of the excavation nor stockpiled E&P waste. Additionally, orange construction fencing is not adequate to prevent livestock entry.

-Two small soil stockpiles labeled "Clean" are visible immediately adjacent to stockpiled oily waste labeled "Contaminated"; BMPs are inadequate.

-Operator has not installed fencing in accordance with landowner requests and Rule 1002.a.

See attached corrective actions.

LocationOverall Good: ☐

Signs/Marker:			
Type	WELLHEAD		
Comment:	Sign/emergency contact info not posted at Dechant State 3 Well (Photo 11).		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	07/11/2025

Emergency Contact Number:			
Comment:	No emergency contact information present.		
Corrective Action:		Date:	

Good Housekeeping:			
Type	OTHER		
Comment:	Weeds & debris (torn orange construction fencing) observed on location (See Photos 3, 5 & 7-9).		
Corrective Action:	Comply with Rule 606.	Date:	07/24/2025

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?

Fencing/:			
Type	OTHER		
Comment:	Ongoing issue - See previous corrective actions on FIR Doc Nos: 710100264 (9/23/2024), 710100288 (10/10 & 10/15/2024), 717100143 (3/26/2025). Orange construction fencing has been installed around portions of the excavation, but has fallen and does not fully encompass the excavation perimeter. As previously documented in Field Inspection Report Doc. #710100288, per the landowner, either a three strand barbed wire fence or a hot wire fence that will completely exclude the livestock from any of the contaminated soils is required. Plastic "snow" fencing will not be sufficient to keep livestock away from the contaminated area. See photos 1-10.		
Corrective Action:	Operator has not complied with previous corrective actions nor Rule 913.b.(5).B.i and ECMC Rule 913.b.(5)B.i-v - Remediation Standards Operator Guidance. 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 Rule 913.b.(5)B.i-v - Remediation Standards Operator Guidance which requires fencing used be appropriate to site conditions, ie: nearby residences/schools, depth of excavation, presence of ground or surface water, livestock, wind, etc. Corrective action due date backlisted per Field Inspection Report Doc. #710100264.		Date: 09/25/2024

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			

Corrective Action:		Date:	
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Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: **Spill ID 487984/REM 39579 remedial excavation remains open. Petroleum hydrocarbon staining is visible in the center of the excavation floor (Photos 9 & 10).**Corrective Action: **In accordance with Rule 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered.**

Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: 1000 Depth to Ground Water: 20

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type Management Condition GPS (Lat) (Long)

Oily Soil	Piles	Inadequate			
Comment	Ongoing issue - See previous FIRs Doc Nos: 710100264 (9/23/24), 710100288 (10/10 & 10/15/24), 717100143 (3/26/25): Oily E&P waste labeled "contaminated" is stockpiled in two areas on location. The majority of oily waste is stockpiled on liners; however, the liners are discontinuous and/or perimeter berms have been driven over, and oily waste has spilled and spread outside of the lined area. BMPs are inadequate. Two small soil stockpiles labeled "Clean" are visible immediately adjacent to stockpiled oily waste labeled "contaminated"; BMPs are inadequate. See Photos 1-8. Note: Stockpile signage documented in previous inspections remains the same see photos 3, 4 & 6 in ECMC Photo Log (Doc #717100149) attached to FIR Doc #717100143.				
Corrective Action	Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts not previously submitted to the next Supplemental Form 27 per Rule 905.b.(3). Additionally, Operator shall manage waste in compliance with Rule 913.b.(5).B and ECMC Rule 913.b.(5)B.i-v - Remediation Standards Operator Guidance. Operator shall provide photo documentation of stockpile liner integrity via Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil has spilled outside containment for Full Table 915-1 Contaminants of Concern.				Date: _____

Spill/Remediation:Comment: **Remediation Project #39579 was created for continued site investigation and remediation of Spill ID 487984. Hydrocarbon stained soil remains in situ in the base of the excavation (Photos 9 & 10) and E&P waste remains stockpiled on location with inadequate BMPs (Photos 1-8). Quarterly reporting was required under Remediation Project #39579; the last Form 27 for this project was submitted on 03/14/2025 and approved on 03/18/2025 (Document #404116584).**Corrective Action: **As of 7/10/2025 Operator is 24 days late on quarterly reporting for Remediation Project #39579. Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. CA due date backdated to when the Supplemental Form 27 was due.**

Date: 06/16/2025

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 _____ Fail _____

Comment Ongoing issue: See previous corrective actions on FIR Doc Nos: 710100288 (10/10 & 10/15/2024), 717100143 (3/26/2025). State Land Board has previously contacted the Operator to request installation of fencing around all O&G equipment on land owned by the State Land Board. The Land Board requested all fencing be constructed in a manner that is capable of preventing livestock entry, in order to prevent injury to livestock as well as avoid incidents where livestock damage O&G equipment, creating a safety hazard. Appropriate fencing has not been installed around O&G equipment (Photo 11).

Corrective Action Operator shall install fencing as soon as possible in accordance with Rule 1002.a. CA due date backlisted per Field Inspection Report Doc. #710100288.

Date 10/31/2024

1002b. SOIL REMOVAL AND _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

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 ☐

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: Ongoing issue: See previous CAs on FIR Doc Nos: 710100264 (9/23/24), 710100288 (10/10 & 10/15/24), 717100143 (3/26/25). Inadequate BMPs in place to control wind erosion & stormwater run-on & runoff. Stained soil & E&P waste remain in situ & stored on location without adequate BMPs (P. 2-10). Asymmetrical ripples indicate soil has been transported across the excavation floor by wind (P. 5, 6, 9, 10). Rill formation and colluvium indicate soil (including E&P waste) has been eroded by stormwater runoff & wind erosion & deposited throughout the location & into the open excavation (P. 2, 3, 5-10). Excavation sidewalls are unstable & soil continues to slough off excavation sidewalls onto the floor of the excavation (P. 5, 6, 10 & 11).</p> <p>Corrective Action: Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater & soil. Manage surface water & stormwater around spill site in a manner that prevents impacts to those matrices. Install BMPs in accordance with Rule 1002.f.(2) to prevent erosion, run-on & runoff, & completely contain impacts. Corrective action backdated to Field Inspection Report Doc. #710100264.</p> <p>Date: 09/25/2024</p>						
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

ECMC Comments

Comment	User	Date
Weather: Overcast, ~5-10 mph winds, ~70F PPE: Level D & FR	andersoln	07/03/2025

Attached Documents

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

Document Num	Description	URL
718300023	2025_0527_Dechant State 3 Flowline Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7136515