

**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:

07/17/2025

Submitted Date:

07/28/2025

Document Number:

697602565

**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:**

- 10 Number of Comments
- 6 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
Kirschner, Steven		steven.kirschner@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Brown, Kari		kari.oakman@state.co.us	
, KPK		cogcc@kpk.com	All inspections
Graber, Nikki		nikki.graber@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478831	Flowline System	AC	07/15/2024		-	Facility 1	EI

**General Comment:**

This is an environmental inspection to determine progress on Spill ID 485939/Remediation Project #4121. 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.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:  Date: \_\_\_\_\_

<b>Good Housekeeping:</b>			
Type	WEEDS		
Comment:	Weeds observed throughout work area and within open excavations.		
Corrective Action:	Comply with Housekeeping Rule 606.c	Date:	08/04/2025
Type	TRASH		
Comment:	Trash and debris observed throughout the location.		
Corrective Action:	Comply with Housekeeping Rule 606.d	Date:	08/04/2025

Overall Good:

<b>Spills:</b>			
Type	Area	Volume	
In Containment: No			
Comment: <input type="text"/>			
<input type="checkbox"/> Multiple Spills and Releases?			

<b>Fencing/:</b>			
Type	OTHER		
Comment:	Multiple open excavations are present at this spill site. Fencing around the excavations has fallen and is not adequate.		
Corrective Action:	Per CA on FIR Doc #710100144: "Operator shall continuously monitor 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, depth of excavation, presence of ground or surface water, livestock, wind, etc. when sites are not attended.". Compliance with Rule 913.b.(5)B.i and ECMC Guidance 913.b.(5)B. i-v and continuous monitoring and maintenance of BMPs was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th and March 1st, 2024.		Date:
			02/05/2024
CA due date backdated to CA on FIR Doc #710100144.			

<b>Equipment:</b>			corrective date
Type: Flow Line	#		
Comment:	Multiple uncapped flowlines are exposed within the open excavation. ECMC Integrity Inspector has been included on this inspection. Historically abandoned and out of service flowlines are exposed in the excavation.		
Corrective Action:	Open flowline cut ends must be sealed per 1105.e.4. Flowlines must be abandoned per Rule 1105.		Date: 08/04/2025

<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:		Date:	

<b>Flaring:</b>			
Type			

Comment:	
Corrective Action:	Date:

**Inspected Facilities**

Facility ID: 478831 Type: Flowline API Number: - Status: AC 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: Per COA's on Form 19 Document #404253490 submitted 6/26/2025: Quarterly reporting (90 days) is required under Remediation Project #4121. Operator shall include the Spill ID associated with this form on the subsequent Supplemental Form 27 and select Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912 in addition to the previous Rule selection. Pursuant to Rule 912.b.(6) Operator was required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure. Additional violations may result in enforcement.

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

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		Inadequate			
Comment	<span style="color: blue;">Per Comment on FIR Document #710100164: Visibly impacted soil remains in situ and stockpiled on location with missing/inadequate inadequate BMPs. Impacted soils have been transported and tracked outside of containment and the work area. A sheen and free product were observed on water within the open excavation. Other E&amp;P waste (flowlines removed) are being stored on location without any BMPs. Additionally, an excessive amount of surface area (nearly 1 acre) including adjacent agricultural land has been disturbed by site investigation and remediation activities. Remediation activities are not being conducted in accordance with Rules 905.e. and 913.b.(5).B.i.-iv. These CAs remain unchanged from the FIR.</span>				
Corrective Action	<span style="color: red;">Per CA on FIR Document #710100144: "Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts to the next Supplemental Form 19 per Rule 905.b.(3). Additionally, Operator shall manage waste in compliance with Rule 913.b.(5).B i-v and ECMC Guidance 913.b.(5)B i-v. Operator shall provide photo documentation of stockpile liner integrity via Form 19 or Form 27 prior to removal.". Compliance with Rule 905.e. and Rule 913.b.(5).B.i.-v. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 12th, 2024 and gave the Operator 4 days to correct the issue (FIR Doc #697602265). ECMC observed the Operator remained out of compliance on February 29th and March 1st, 2024. CA due date back dated to CA due date on FIR Doc #697602265.</span>				Date: <u>02/16/2024</u>

**Spill/Remediation:**

Comment: Remedial excavation is open and unfenced. Impacted soil was observed on location and within the excavation. Groundwater with an oil sheen was observed within the excavation

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: 02/16/2024

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

Comment:

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

**ECMC Comments**

Comment	User	Date
Site conditions are poor, and the site has been neglected. Fencing around the excavation has fallen and has become a public safety hazard.	ahmadiia	07/28/2025

**Attached Documents**

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

Document Num	Description	URL
404296608	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7164361">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7164361</a>
697602566	Photolog	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7164354">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7164354</a>