

**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:

06/03/2025

Submitted Date:

08/13/2025

Document Number:

717100350

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: Rollins, Grace 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:

- 16 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
,		cogcc@kpk.com	All Inspections
Neidel, Kris		kris.neidel@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
465486	TANK BATTERY	AC			-	Dwinell Tank Battery	EI
473059	SPILL OR RELEASE	CL	03/19/2020		-	Dwinell Tank Battery	EI

General Comment:

ECMC Field Inspection Report Summary

This is an environmental inspection to determine progress on Spill ID 473059 and Remediation Project # 15326. The tank battery (Facility ID 465486) was also included in the scope of this inspection. 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.

Site Name: Dwinell Tank Battery

Spill ID: 473059

Remediation Project #: 15326

Facility ID: 465486

Reported Date of Discovery: 03/09/2020

Date of Inspection: 06/03/2025

Weather: Partly cloudy, 56°F

Site is located within:

- Greater Sage Grouse Priority Habitat Management Area High Priority Habitat
- Greater Sage Grouse Lek Site High Priority Habitat
- Range land (immediately adjacent, all directions)

Current site status:

- Stained soil and petroleum hydrocarbon fluids were visible beneath a joint in an above-ground line. Fluids were not observed actively leaking from the line at the time of the inspection.
- Hoses and miscellaneous supplies/equipment were visible adjacent to tanks. While at an adjacent location, Operator personnel indicated that they were actively in the process of replacing a motor at the tank battery. Therefore, these items may be related to that maintenance.
- A portion of the tank containment berm appears to have been recently repaired; however, the berm does not appear to have been consolidated.
- Portions of the separator containment berm appear to have been eroded.
- Rill erosion has occurred as stormwater and sediment have been transported southwest from the location. Straw waddles have been installed, but are inadequate to minimize erosion.
- Localized areas of stained soil are visible on location; a petroleum hydrocarbon odor was observed when the stained soil was disturbed.
- A liner is visible at the excavation and stockpile; however, the liner is discontinuous and has holes/tears.
- An unmarked soil stockpile is visible within the excavation extents.
- Metal wire fencing has been installed around the excavation and stockpile area but is sagging. Manure is visible within the berm of the excavation area.
- A metal line/riser is visible protruding from the ground surface west of the location.
- The placard on a produced water tank has peeled and is illegible.
- Paint is peeling from portions of tanks; peeled paint beneath a production tank label is impacting legibility.
- Weeds and trash are visible on location.

See attached corrective actions.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	The placard on a produced water tank has peeled and is illegible.		
Corrective Action:	Install or repair sign to comply with Rule 605.		Date: <u>10/12/2025</u>
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
Good Housekeeping:			
Type	TRASH		
Comment:	Trash is visible on location.		
Corrective Action:	Comply with Rule 606.		Date: <u>08/20/2025</u>
Type	STORAGE OF SUPL		
Comment:	Hoses and miscellaneous supplies/equipment were visible adjacent to tanks. While at an adjacent location, Operator personnel indicated that they were actively in the process of replacing a motor at the tank battery. Therefore, these items may be related to that maintenance.		
Corrective Action:			Date: _____
Type	WEEDS		
Comment:	Weeds are visible on location.		
Corrective Action:	Comply with Rule 606.		Date: <u>08/20/2025</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Comment:	Localized areas of stained soil (separate from the impacts observed beneath the above-ground line) are visible on location; a petroleum hydrocarbon odor was observed when the stained soil was disturbed.		
Corrective Action:	Comply with ECMC Rules. Operator shall immediately control and contain spills/releases and investigate, clean up and document impacts per Rule 912.a. Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts (photo documentation and waste disposal manifests) to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.		Date: <u>09/14/2025</u>
In Containment: No _____			
Comment: <input style="width: 100%;" type="text"/>			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Metal wire fencing has been installed around the excavation and stockpile area but is sagging. Manure is visible within the berm of the excavation area.		
Corrective Action:	Secure access to excavation in accordance with Rule 913.b.(5).B.i and ECMC Guidance 913.b.(5)B i-v.		Date: <u>08/27/2025</u>

Equipment:		corrective date
Type: Flow Line	#	
Comment:	A metal line/riser is visible protruding from the ground surface west of the location.	
Corrective Action:	Complete flowline and crude oil transfer line abandonments to comply with Rule 1105.e.(4).	Date: 09/14/2025

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:	Paint is peeling from portions of tanks; peeled paint beneath a production tank label is impacting legibility.				
Corrective Action:	Inspect, maintain and repair tanks to comply with Rule 609.b.				Date: 09/14/2025

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:	A portion of the tank containment berm appears to have been recently repaired; however, the berm does not appear to have been consolidated. Portions of the separator containment berm appear to have been eroded.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o.			Date: 09/14/2025

Venting:

Yes/No	
Comment:	
Corrective Action:	Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities

Facility ID: 465486 Type: TANK API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 473059 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: Stained soil and petroleum hydrocarbon fluids were visible beneath a joint in an above-ground line. Fluids were not observed actively leaking from the line at the time of the inspection.

Corrective Action: Comply with ECMC Rules. Operator shall immediately control and contain spills/releases and investigate, clean up and document impacts per Rule 912.a. Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts (photo documentation and waste disposal manifests) to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules. Date: 09/14/2025

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	Piles				
	Comment	An unmarked soil stockpile is visible within the excavation extents.			
	Corrective Action	Operator shall comply with Rule 913.b.(5).B.iv. and properly store, handle, and manage all E&P Waste to prevent contamination of stormwater, surface water, Groundwater, and soil.			Date: _____

Spill/Remediation:

Comment: Remediation Project # 15326 was created to address the ongoing remediation at the Dwinell Tank Battery associated with Spill ID 473059. A liner is visible at the excavation and stockpile; however, the liner is discontinuous and has holes/tears.
Quarterly reporting is required under Remediation Project # 15326; the last Form 27 for this project was submitted 11/23/2022 and denied by ECMC on 03/28/2023 (Document # 403150134).

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (90 days). Operator shall provide an updated Form 27 for Remediation Project # 15326. Date: _____

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: Rill erosion has occurred as stormwater and sediment have been transported southwest from the location. Straw waddles have been installed, but are inadequate to minimize erosion. Operator has failed to implement BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite and site degradation.

Corrective Action: Comply with Rule 1002.f. BMPs shall be maintained until the location is abandoned and final reclamation is achieved pursuant to Rule 1004.
 CA due date backlisted per Field Inspection Report Document Number 697505276.

Date: 05/27/2024

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
404314780	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7186054
717100352	ECMC Photo Log - Dwinell Tank Battery - 06.03.2025	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7186027