

**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:

08/27/2025

Submitted Date:

09/04/2025

Document Number:

714300243

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: Brown, Kari On-Site Inspection 2A Doc Num: _____

Status Summary:

THIS IS A FOLLOW UP INSPECTION

FOLLOW UP INSPECTION REQUIRED

NO FOLLOW UP INSPECTION REQUIRED

Findings:

10 Number of Comments

7 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
,		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Motisi, Dan		dmotisi@kpk.com	KPK environmental
Freese, Steve		steve.freese@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
487984	SPILL OR RELEASE	CL			-	Dechant State 3 Flowline	EI

General Comment:

This is an environmental inspection to determine progress on Spill ID 487984/Remediation Project No 39579. Any corrective actions from previous inspections, NOAVs, or COAs 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.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds throughout the location including within and outside of the excavation and on soil stockpiles. This remains unaddressed from the previous inspection.		
Corrective Action:	Comply with Rule 606. CA date from Insp Doc No 718300022.	Date:	07/24/2025
Type	TRASH		
Comment:	Orange construction fencing has torn and become trash. Additional trash (beer cans & banner flags) observed on location.		
Corrective Action:	Comply with good housekeeping Rule 606.	Date:	09/11/2025

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type			
Comment:	As previously documented in Field Inspection Report Doc Nos 710100288 & 718300022, 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. This remains unaddressed from the previous inspections.		
Corrective Action:	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 ECOM 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. CA date from Insp Doc No 710100264	Date:	09/25/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 487984 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: Excavation remains open on location. Sediment has run into the excavation and covers the excavation floor. Water (likely rainwater due to recent precipitation events) was observed in the bottom of the open excavation. See attached for additional information regarding remediation status.

Corrective Action: Operator shall provide an updated Form 27 for Remediation #39579 with a workplan and timeline for remediation of Spill ID 487984.

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)
Comment	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. This remains unaddressed from previous inspections.		
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: Quarterly reporting is required for Remediation Project #39579. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on March 14, 2025 (Doc # 404116584).

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (90 days). Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated.

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: 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. Asymmetrical ripples indicate soil has been transported across the excavation floor by wind. 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. Excavation sidewalls are unstable & soil continues to slough off excavation sidewalls onto the floor of the excavation. This remains unaddressed from previous inspections.

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. CA date from Insp Doc No 710100264.

Date: 09/25/2024

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
714300244	Remediation Status Sheet	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7219459
714300245	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7219460