FORM INSP Rev X/20

State of Colorado
Energy and Carbon Management Commission

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FIELD INSPECTION FORM

Inspection Date: 08/04/2025
Submitted Date: 09/17/2025
Document Number: 718300058

Loc ID | Inspector Name: Anderson, Laurel | On-Site Inspection ☐ | 2A Doc Num:

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

Status Summary:

☒ THIS IS A FOLLOW UP INSPECTION
☒ FOLLOW UP INSPECTION REQUIRED
☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

8 Number of Comments
4 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
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist
Brown, Kari		kari.oakman@state.co.us	
Robinson, Taylor		taylor.robinson@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Graber, Nikki		nikki.graber@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
487690	SPILL OR RELEASE	CL			-	Facility 3 @ Rasmussen Flowline	EI

General Comment:

This is a combined ECMC Environmental Inspection report for inspections conducted at KP Kauffman's (Operator's) Facility 3 @ Rasmussen Flowline (Spill ID 487690/REM 38489) on August 6 and September 4, 2025.

On August 6, 2025, ECMC Environmental Protection Specialists Laurel Anderson, Alex Ahmadian and Taylor Robinson performed an Environmental Inspection to witness installation of 5 monitoring wells. ECMC field notes and photo documentation are attached to this report. Due to an issue with the application used to collect photo documentation on August 6, 2025 the Lat/Long, Elevation, Temperature, Wind Speed, Humidity displayed on each photo represents conditions at the time & location where Photo 1 was collected. As such ECMC returned on September 4, 2025, to collect additional photo documentation and to obtain approximate GPS coordinates for the five monitoring wells previously installed on August 6, 2025. Photo documentation has been attached to this report.

All unaddressed and/ongoing COAs, CAs and comments from previously approved and/or denied forms, and field inspection reports remain applicable.

Facility 3 Flowline Facility ID: 478833
Spill/Release Points:
Spill Name: Facility 3 @ Rasmussen Flowline
Spill ID: 487690
Date of Discovery: 8/23/2024
Lat/Long: 40.110337,-105.024372
Days Open (as of 9/4/2025): 377 days
Remediation Project #38489
Form 27i (Doc #403909415) Received on 10/23/2024
Most recent Supplemental Form 27 - No Supplemental Form 27s have been received.
Operator is behind on quarterly reporting (due every 90 days) for REM 38489.

The Facility 3 @ Rasmussen Flowline Spill (Spill ID 487690) occurred within:
-A publicly maintained road (Preserve Drive - has been closed and signage installed)
-The Town of Frederick
-A bald eagle roost high priority habitat

The Facility 3 @ Rasmussen Flowline Spill (Spill ID 487690) is in close proximity to:
-An unmapped, unlined irrigation ditch located ~50' E, discharges to Boulder Creek
-Unmapped surface water pond (~140' N)
-Multiple occupied structures
-Occupied Osprey platform (<500' SW)

Summary of Environmental Field Inspections:
8/6/2025: Field notes attached to document site conditions and ECMC observations - A summary of the field notes has been provided below:
-ECMC personnel, the landowner, Operator and contract drilling personnel were on location at the time of the field inspection.
-Ruts, cobbles, uneven surfaces and pieces of torn liner were observed in the area previously disturbed by initial spill response and remediation activities.
-Preserve Drive (incorrectly referred to as Precision Drive in field notes) is showing signs of settling/subsidence/improper compaction and/or a potential soil drainage issue.
-A direct push rig was used to install five soil borings to 10’ bgs, then five 2” stick-up monitoring wells were installed to 10’ bgs using a solid stem auger. The monitoring wells appeared to be completed with 5’ of screen and 5’ of riser.
-Environmental personnel collected two composite soil samples from each soil boring - one from the volume of soil recovered in the 1” core from the 0-5’ bgs interval and another from the volume of soil recovered in the 1” core from the 5-10’ bgs interval.
-The scope of work performed on 8/6/2025 does not adequately address the outstanding conditions of approval.

9/4/2025: ECMC returned to the location for additional documentation. No Operator or contract environmental personnel were on location at the time of the field inspection. Two partially filled, unlabeled, black 55-gallon drums were observed on location.

Inspected Facilities

Facility ID:	487690	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: Per COA on Form 19s Doc #403906299: "Operator will provide notice to ECMC EPS Kari Brown (kari.l.brown@state.co.us) and Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to any sampling events, monitoring well installation, or backfill performed on location."

Corrective Action: Operator has not notified ECMC of any groundwater sampling from the newly installed monitoring wells. Operator shall continue notifying ECMC in accordance with the above COA and provide documentation of the required notifications on subsequent Supplemental Form 27s. 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: Ongoing issue: Pieces of the contaminated soil stockpile liner were observed at multiple locations within and adjacent to Preserve Drive.

Corrective Action: 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 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. Date: _____

Spill/Remediation:

Comment: Operator is behind on quarterly reporting for this remediation project.

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (every 90 days). Corrective Action due date back dated to 90 days from when the Form 27 Initial was approved. Date: 04/16/2025

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 _____

Comment

Corrective Action Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment

Corrective Action Date _____

1002c. PROTECTION OF SOILS _____

Comment

Corrective Action Date _____

1002E. SURFACE DISTRURBANCE 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 _____

Inspector Name: Anderson, Laurel

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? Fail

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 Fail 80% Revegetation Fail

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? F

Comment: Ongoing Issue: Per Rule 1003, all disturbed areas affected by drilling or subsequent operations shall be reclaimed. Vehicle rutting from initial spill response activities remains in the grassy area adjacent to Preserve Drive. Disturbed grassy area is now devoid of grass and becoming inundated with weeds.

Ruts, cobbles and uneven ground surfaces were observed in the area previously disturbed by initial spill response and remediation activities. Preserve Drive (incorrectly referred to as Precision Drive in field notes) is showing signs of settling/subsidence/improper compaction and/or a potential soil drainage issue.

Corrective Action: Operator shall comply with Rule 1003 to repair all rutting and reseed as soon as environmental conditions will permit using a seed mixture requested by the landowner. Establish vegetation with total perennial, noninvasive uniform plant cover of at least eighty (80) percent of reference area levels and continue to monitor and manage this site until the location meets Rule 1003 standards, including weed management. Additionally, Operator shall ensure the former excavation has been properly backfilled: materials used appropriate for site conditions and comparable to that of the reference soil, fill material properly compacted to prevent subsidence and the grade leveled to match the original contour.

Date _____

Overall Interim Reclamation Fail

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 ☐

ECMC Comments

Inspector Name: Anderson, Laurel

Comment	User	Date
Current site status: -Weeds/Vehicle Rutting (See Photos 4 & 9 from 9/4/2025 photo log) -Settling/Subsidence along Preserve Drive (See Photo 3 from 8/6/2025 photo log) -Pieces of torn liner (See Photos 1, 2 and 12 from 8/6/2025 photo log) -Late Quarterly Reporting under REM 38489 -Impacts to soil and groundwater have not been properly characterized nor delineated to date. -Two partially filled, unlabeled, black 55-gallon drums were observed on location (See photos 5, 6 and 8 from 9/4/2025 photo log) See attached corrective actions. Per COA on Form 27i Doc #403909415: “In addition to Operator's proposed soil sampling plan Operator shall: -Collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. -Samples will be collected from areas most likely to have been impacted, and the horizontal and vertical extent of contamination will be determined. The number and location of samples will be appropriate to determine the horizontal and vertical extent of the impact. -Discrete soil samples will be collected in a method that minimizes contamination from sampling methods and sample handling and ensures adequate sample volume and the integrity of the sample. -When groundwater is encountered during the investigation, characterization of the soil impacts will still be completed by submitting soil samples from the unsaturated zone, capillary fringe, and/or the “smear zone” for laboratory analysis. Note: The maximum depth of soil samples collected to date is ~5' bgs. Operator has not collected soil samples from the capillary fringe, and/or the “smear zone” to date. A minimum of three samples from the base of the former excavation extent are required. Groundwater is estimated to be between 7-10' bgs. -Operator will collect samples on a bias; from areas and depths where the highest concentrations would be expected based on visible contamination, odor characteristics, field screening results, release characteristics, soil type and, if available, information from prior investigations.” Operator has not collected soil samples in accordance with ECMC Rule 915.e.(2) Operator Guidance Document. Samples collected from the soil borings during monitoring well installation were composite samples and not from the areas most likely to have been impacted. Composite samples were obtained from ~1” diameter soil cores which do not provide adequate soil sample volume to allow for collection of discrete soil samples from areas most likely to have been impacted and further site characterization and horizontal and vertical delineation of contamination. Operator shall submit a Supplemental Form 27 with a plan to address the outstanding conditions of approval as soon as possible and no later than EOB September 24, 2025. As required by Rule 915.e.(3)A.ii and per COA on Form 27i Doc #403909415: Operator was required to install monitoring wells (within the spill/release area, cross-gradient, down-gradient, and up-gradient) to properly characterize groundwater pursuant to Rule 915 and determine hydraulic gradient by March 2, 2025. Operator has not installed monitoring wells within the source area to properly characterize groundwater pursuant to Rule 915. Additionally, the monitoring wells installed on 8/6/2025 were installed 157 days late. In accordance with Rule 914, if impacts (soil or groundwater) are observed during monitoring well installation a step out monitoring well(s) shall be installed to define the horizontal extent of impacts to soil and groundwater and the monitoring wells shall be installed as soon as possible and within 45 days of observations. Note: The "one monitoring well" noted in FIR Doc #717900217 is not associated with this Operator/Remediation Project and appears to be associated with the landowners irrigation system. All newly installed monitoring wells have j-plugs installed.	andersoln	09/17/2025

Attached Documents

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

Inspector Name: Anderson, Laurel

Document Num	Description	URL
404357879	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7240919
718300059	2025_0806_ECMC Field Notes	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7240916
718300060	2025_0806_Facility 3 @ Rasmussen Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7240917
718300061	2025_0904_Facility 3 @ Rasmussen Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7240918