

**FORM
INSP**

Rev
X/20

**State of Colorado
Energy and Carbon Management Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

10/21/2025

Submitted Date:

10/27/2025

Document Number:

718300078

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: Anderson, Laurel 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:

- 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
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Deranleau, Greg		greg.deranleau@state.co.us	
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist
Brown, Kari		kari.oakman@state.co.us	
Rollins, Grace		grace.rollins@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
,		cogcc@kpk.com	All Inspections
Watzman, Ross	303-825-4822	rwatzman@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478542	SPILL OR RELEASE	CL	02/11/2022		-	Cosslet A 9 Flowline	EI

General Comment:

This is an environmental inspection to determine progress on Spill ID 478542/Remediation Project No 18952. 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.

NOTE: Immediate corrective action is required.

Spill ID: 478542

Spill Name: Cosslet A 9 Flowline

Remediation Project #: 18952

Reported Date of Discovery: 11/10/2020

Date of Inspection: 10/21/2025

Spill is located within or adjacent to:

-City of Dacono Municipality

-Freshwater Emergent Wetlands

-Crop land

Site status as of 10/21/2025:

-No Operator personnel or crews were observed on location at the time of inspection.

-Excavation remains open - In some areas sidewalls appear unstable and soil has sloughed from the sidewalls onto the base of the excavation. No signage was observed. See Photos 4-7, 9-10 &, 12-16.

-No additional soil appears to have been removed since the previous inspection on 8/27/2025, Field Inspection Report Document #714300209.

-A roughly North-South trending section of flowline (Black HDPE Polyethylene/fiberglass) is exposed and visible along the central portion of the excavation. See Photos 4-6, 10 & 13-15.

-Gray and black petroleum hydrocarbon staining (circled in red) is visible in situ on multiple excavation sidewalls and beneath the flowline. See Photos 4-6, 10, 13 & 15.

-Groundwater with a hydrocarbon sheen is visible at the base of the excavation. See Photos 7 & 9.

-Metal fencing and orange construction fencing partially surround the excavation, but do not fully encompass the perimeter of the excavation. See Photos: 4-7, 9-10, 12-16.

-Two monitoring wells with metal monuments were observed on location - Both were not secured and one was open without a j-plug installed. See Photos 10 & 11.

-Weeds were visible throughout the work area, stockpile, and within/around the open excavation. See Photos: 1-10, 12-24.

-A oily soil stockpile labeled "contaminated" remains on location. A liner is present, however, the liner has tears throughout. The earthen berm surrounding the stockpile is discontinuous and oily soil has been tracked out/transported (via wind/stormwater erosion) outside the lined containment area onto bare ground around the stockpile and adjacent to a freshwater emergent wetland. See Photos 1-3, 7 & 17-24.

-Erosion control wattles were observed along the northern end of the excavation. The wattles are disintegrating and are not properly installed. See Photo 12.

-Animal tracks were observed along the base of the excavation and on the oily stockpile liner. See Photos 15, 19-21 & 24.

See attached corrective actions. A Supplemental Form 27 is required and is 103 days past due as of the day of the inspection.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

WEEDS

Comment: Weeds completely overgrown throughout the location including within and outside of the excavation and on contaminated soil stockpile. This remains unaddressed from the previous inspections. See Photos: 1-10, 12-24.

Corrective Action: Comply with Rule 606. CA date from Insp Doc No 714300191.

Date: 07/23/2025

Overall Good:

Spills:

Type

Area

Volume

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type

OTHER

Comment: Fencing is a mix of cattle panel and orange snow fencing; orange snow fencing has fallen down around open excavation and is no longer adequate to restrict access to the excavation. See Photos: 4-7, 9-10, 12-16. This remains unaddressed from the previous inspection. Additionally, no fencing has been installed around stockpiled oily soil. Animal tracks were observed in the base of the excavation and on the stockpile liner. See Photos 15, 19-21 & 24.

Corrective Action: Secure access to excavation in compliance with Rule 913.b.(5).B.i and ECMC Guidance 913.b.(5)B i-v. CA date from Insp Doc No 714300191.

Date: 07/23/2025

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities

Facility ID: 478542 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: Land development is encroaching on the remediation area to the east and northeast of the excavation. At the time of the previous inspection (8/27/2025 - Doc #714300209), land grading had occurred directly adjacent to the northernmost monitoring well (MW-4) and ~10-15 feet from the eastern wall of the excavation, which showed visible hydrocarbon impacts. Form 27 Doc No 404120681 (3/13/2025) proposed additional monitoring well installation/soil borings in these areas. No additional excavation appears to have been conducted since the 7/15/2025 inspection (Doc #714300191). Remediation excavation remains open. Hydrocarbon impacts/staining was observed in excavation sidewalls and on excavation floor below 3rd party pipelines. North wall with visible hydrocarbon impacts is ~25' from mapped wetland. Hydrocarbon sheen was observed on groundwater in the open excavation; 2 monitoring wells remain on site to the north and east of the open excavation. attached for additional information regarding remediation status.

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. Operator will IMMEDIATELY restart remedial source removal of the impacts. Operator shall provide an updated Form 27 for Remediation #18952 with a for remediation of Spill ID 478542 and any analytical data not submitted to date. CA date from Insp Doc No 714300209.

Date: 09/10/2025

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	Inadequate		
Comment	Soil stockpile marked 'contaminated' stored on location. Stockpile liner is beginning to tear and soil has overflowed berms/has been transported by rainwater in some locations; BMPs around the soil stockpile are inadequate. Soil stockpile is directly adjacent to mapped wetlands. Weeds are growing throughout the soil stockpile and berms. This remains unaddressed from the previous inspection.			
Corrective Action	Manage waste in compliance with Rule 913.b.iv and ECMC Guidance 913.b.(5)B i-v. Prior to spill/remediation closure, Operator will collect soil samples from underneath the observed soil stockpile area and surrounding areas where the stockpile has overflowed berms. CA date from Insp Doc No 714300191.			Date: 07/23/2025

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

ECMC Comments

Comment	User	Date
Weather: Sunny, slight breeze, ~70F PPE: Level D & FR	andersoln	10/27/2025

Attached Documents

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

Document Num	Description	URL
718300079	2025_1021_Cosslet A 9 Flowline Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7301871
718300080	2025_1021_ECMC Remediation Status Evaluation Sheet	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7301872