

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: <u>10/22/2025</u> Submitted Date: <u>10/30/2025</u> Document Number: <u>697602592</u>
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

Findings:

10 Number of Comments

6 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
Kirschner, Steven		steven.kirschner@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Burn, Diana		diana.burn@state.co.us	
Rollins, Grace		grace.rollins@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
		cogcc@kpk.com	All Inspections

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
485939	SPILL OR RELEASE	CL			-	Pan Am B 4,6,10,12	EI

General Comment:

This is an environmental inspection in response to a phoned-in complaint to the ECMC on October 13, 2025. This environmental inspection was conducted to address the complaint and determine progress on Spill ID 485939. 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 onsite at the time of this field inspection.

The landowner called the ECMC on October 13, 2025 and described a spill and large excavation on his property that has been open and unresolved for years. EPS Alex Ahmadian met with the landowner at approximately 10 AM on October 22, 2025. The landowner showed EPS Alex Ahmadian the site and provided details, claiming that the excavation had been open for years and that the Operator responsible, KPK, had torn down his personal fence and had not been to the site in months. The landowner was frustrated about his fence and would like a timeline on when the site will be cleaned up, and his fenced restored as it has been creating issues with trespassing since the Operator tore it down.

No identifiable changes were made between the 9/30/2025 and 10/22/2025 inspections. Photos attached to document site conditions.

Site Name: Pan Am B 4,6,10,12
 Spill ID: 485939
 Date of Inspection: 10/22/2025

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds overgrown throughout the property. CA been issued on multiple inspections with no response by the Operator.		
Corrective Action:	Comply with Rule 606. CA backtracked.	Date:	08/04/2025
Type			
Comment:	Trash/E&P waste (apparent flowline fittings) is visible on location.		
Corrective Action:	Properly dispose of in accordance with Rule 905. CA backtracked.	Date:	10/08/2025

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type	LOCATION		
Comment:	Operator tore down the fence of the property owner and the responsible for all property damage.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Multiple open excavations are present at this spill site. Orange construction fencing has been installed around the open excavations, but has completely fallen or torn in multiple areas, and does not surround the perimeters of the excavations. This has not been addressed on multiple inspections.		
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. iv 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. CA due date backdated to CA on FIR Doc #710100144.		Date: 02/05/2024

Equipment:

Type: Flow Line	#		corrective date
Comment:	Multiple uncapped flowlines are exposed within the open excavation. 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. CA backtracked.		Date: 08/04/2025

Venting:

Yes/No			
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Comment:			
Corrective Action:		Date:	

Flaring:

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

Facility ID: 485939 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

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)
Comment	<p>The larger soil stockpile referenced in the attachments of Form 19 Supplemental Document #404253490 has been removed. However, smaller unmarked soil stockpile is visible adjacent to the southern excavations. Weeds are visible on the soil stockpile. The soil stockpile observed on location at the time of inspection is consistent with those documented by previous Field Inspection Report Document # 710100164, completed in response to Spill ID 485939.</p> <p>Observation of larger stockpile removed first made on FIR Document #717100392. CA reflects other stockpiles that are still onsite.</p>		
Corrective Action	<p>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 FIR Doc #697602265.</p>		Date: <u>02/16/2024</u>

Spill/Remediation:

Comment:	A large excavation remains open at the northern-central area of the location. Groundwater is visible at the base of the larger excavation. Multiple smaller excavations remain open at the southern boundary of the location. Weeds obscure visibility of the base and sidewalls of the southern excavations.		
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. CA due date back dated to FIR Doc #697602265.		Date: <u>02/16/2024</u>

Emission Control Burner (ECB): _____

Comment: _____

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

ECMC Comments

Comment	User	Date
This FIR was in response to a phoned-in complaint by the landowner. Multiple CAs remain from previous FIRs. Operator has not addressed many of the concerns and the landowner has concerns about his fencing. Site conditions are poor and have been neglected.	ahmadiia	10/30/2025

Attached Documents

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

Document Num	Description	URL
697602593	Photolog	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7309712