

**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:

11/19/2025

Submitted Date:

11/25/2025

Document Number:

714300307

**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

**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:**

11 Number of Comments

6 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
Chew, Cullen		cchew@kpk.com	<a href="#">KPK environmental</a>
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Wolverton, Casey		casey.wolverton@state.co.us	
Motisi, Dan		dmotisi@kpk.com	<a href="#">KPK environmental</a>
Watzman, Ross		rwatzman@kpk.com	<a href="#">KPK</a>
,		cogcc@kpk.com	<a href="#">All Inspections</a>
Graber, Nikki		nikki.graber@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
481725	SPILL OR RELEASE	CL	07/13/2022		-	Milton Nelson	EI
486593	SPILL OR RELEASE	CL			-	Milton Nelson 2	EI

**General Comment:**

This is an environmental inspection to determine progress on Spill ID 481725 & 486593/Remediation Project No 23610. 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 overgrown throughout the location including within and outside of the excavation and through the excavation fencing (photos 4, 5, 7, 8 & 10). This remains unaddressed since the last inspection. CA date from Insp Doc No 714300237.		
Corrective Action:	Comply with Rule 606.	Date:	09/11/2025
Type	TRASH		
Comment:	Stormwater wattle has degraded and become trash (photo 18).		
Corrective Action:	Comply with Rule 606.	Date:	12/09/2025

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Fencing/:**

Type			
Comment:	Fencing around the excavation is inadequate. Fencing is a mix of cattle fencing and orange construction fencing; weeds have grown through the fencing and orange construction fencing is sagging/falling around portions of the excavation (photos 5 & 10) . This remains unaddressed since the last inspection. CA date from Insp Doc No 714300237.		
Corrective Action:	Secure access to excavation in compliance with Rule 913.b.(5).B.i and ECMC Guidance 913.b.(5)B i-	Date:	09/11/2025

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 481725 Type: SPILL OR API Number: - Status: CL Insp. Status: EI

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

Facility ID: 486593 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: Additional excavation has occurred to the west of the main excavation area for water line replacement; this area is now backfilled (photos 3 & 9). COA on Form 27 Doc No 403900606 required ECMC notification at least 48 hours before sample collection or backfill; no notification was provided to ECMC. No additional excavation has occurred in the spill area since the last inspection and the excavation in this portion of the spill area remains open. No groundwater was observed in the open excavation (photos 4-8). A portion of the center of the excavation appeared to have been partially backfilled (photo 6). Exposed flowline is visible in portions of the excavation (photos 5 & 8). No additional Form 27s have been submitted since the last inspection; see document no 714300239 additional information regarding remediation status.

Corrective Action: Operator shall provide an updated Form 27 for Remediation #23160 with a workplan and timeline for remediation of Spill ID 481725 & 486593. The submitted Form 27 shall also include field notes and analytical results for samples collected in the newly excavated an backfilled area west of the main excavation.

Date: 12/09/2025

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)
Comment	Soil stockpile present on location; hydrocarbon staining was visible in portions of the soil stockpile which exhibited hydrocarbon odors when disturbed (photos 14-16). Soil is on liner which has been torn in multiple locations (photos 12-14 & 17). Stormwater BMPs are missing or inadequate around the stockpile and impacted soil has overflowed the stockpile area.		
Corrective Action	Operator shall remove the soil stockpile from location. 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. Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.		
			Date: 12/02/2025

**Spill/Remediation:**

Comment: Quarterly reporting is required for Remediation Project #23488. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on October 3, 2024 (Doc #403917690)

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): \_\_\_\_\_

**Attached Documents**

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

Document Num	Description	URL
404451772	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7349566">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7349566</a>

714300308	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7349565">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7349565</a>
-----------	-------------------	---