

**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:

02/03/2026

Submitted Date:

02/05/2026

Document Number:

697602611

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

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:

- 15 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
Revas, Robbie		robbie.revas@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Jaramillo, Dennis		Jaramillo.Dennis@epa.gov	U.S. EPA Federal Enforcement Lead
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason
Burn, Diana		diana.burn@state.co.us	
Collins, Kilian		kilian.collins@state.co.us	
Rollins, Grace		grace.rollins@state.co.us	
Chew, Cullen		cchew@kpk.com	KPK environmental
Sorensen, Tessa		cdphe_cogcc_consultations@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Bowker, Taylor		Bowker.Taylor@epa.gov	U.S. EPA Federal On-Scene Coordinator
Wolverton, Casey		casey.wolverton@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections
Anderson, Laurel		laurel.anderson@state.co.us	
,		cogcc@kpk.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
492917	SPILL OR RELEASE	AC			-	Facility 5 Gas Line	EI

General Comment:

Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. Photos are attached to document site conditions.

ECMC Field Inspection Report Summary:

Note: this is a two inspections from dates 2/2/26 and 2/3/26.

- Operator personnel: Jose and two others. Conversations were with Jose. No agencies besides ECMC have been on location, per Operator personnel.

2/2/26: On February 2, 2026, ECMC Environmental Protection Specialists Grace Rollins and Laurel Anderson performed an environmental inspection at the Facility 5 Gas Line (Spill ID 492917).

- Operator personnel were continuing to attempt to locate the point of flowline failure by digging a trench between the flowline and creek. Black and gray soil was visible at the southern end of the trench, near a tree (slight odor, swampy, hydrocarbon odors indicative of potential possibly old impacts). Operator personnel don't consider this indicative of impacts because it doesn't have much of an odor; ECMC staff noted staining can be indicative of impacts and communicated that the soil should be treated as impacted in the absence of laboratory analytical data to support the assertion that it is clean. Operator personnel acknowledged the need to dispose of this material. ECMC staff reiterated that stockpiled soil will not be acceptable at this location. Water was visible at the bottom of the trench; no hydrocarbon sheen definitively identified. No soil had been hauled off location.

- Operator personnel plan to find the source of flowline failure prior to conducting any actual remediation. Operator personnel reports that hydrophobic absorbent booms are mats are inspected and replaced at the beginning and end of each workday. The booms/mats do appear to be fresh (previously observed saturating and crumpling not observed); however, they remain inadequate and to not intercept the entire width of the Little Dry Creek in most areas, including those with a sheen. Operator personnel report that they have not observed a sheen beyond the small pond (area with Brantner Ditch lock and green filtrex, previously noted as the extent of booms in 1/26/2026 FIR). However, they have placed additional booms near Hwy 52 as a precautionary measure.

- ECMC staff walked the Little Dry Creek between the spill and Hwy 52 where possible sheen locations were observed downstream. Biologic/native wetland-looking films were also visible.

2/3/26: On February 3, 2026, ECMC Environmental Protection Specialists Alexander Ahmadian, Nikki Graber, and Kari Brown performed an environmental inspection at the Facility 5 Gas Line (Spill ID 492917).

- Operator personnel had still not located the point of flowline failure from the trench between the flowline and creek. Black soil was observed near the excavator with hydrocarbon odor and potential impacts. Operator crews were not sure whether to sample the soil. ECMC staff collected a soil sample from the trench, near the presumed release point, and submitted the sample for Table 915-1 Organics.

- ECMC staff again walked the Little Dry Creek between the spill and Hwy 52 where possible sheen locations were observed downstream. Biologic/native wetland-looking films were also visible. Hydrocarbon sheen was observed just beyond the boom (40.07920, -104.88496).

- Hydrophobic absorbent booms and mats appear to be fresh, however, remain inadequate and to not intercept the entire width of the Little Dry Creek in most areas, as seen with the sheen beyond the boom.

- A possible raptor nest was spotted north of the spill site. Consultation with CPW is required.

Location

Lease Road:			
Type	Main		
comment:	Temporary traffic control cones and pylons have been installed along the road.		
Corrective ActionL		Date:	

Overall Good:

Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____

Good Housekeeping:			
Type	STORAGE OF SUPL		
Comment:	The storage of impacted equipment and trash is still inadequate. Trash and other supplies are scattered throughout the location including in impacted waters		
Corrective Action:	Comply with Housekeeping Rule 606. CA backtracked to FIR Document #697602609.		Date: <u>02/07/2026</u>

Overall Good:

Spills:			
Type	Area	Volume	
In Containment: No _____			
Comment:	<input style="width: 100%;" type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			

Fencing/:			
Type	OTHER		
Comment:	Fencing around the excavation pothole and stockpiles were adequate.		
Corrective Action:		Date:	

Venting:			
Yes/No			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:		Date:	

Flaring:			
Type			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:		Date:	

Location Construction

Location ID: 492917 CDP: _____

Comment:

Corrective Action:

Date: _____

Form 2A COAs:

Comment:

Corrective Action:

Date: _____

Wildlife BMPs:

Comment:

Corrective Action:

Date: _____

Comment:

Corrective Action:

Date: _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities

Facility ID: 492917 Type: SPILL OR API Number: - Status: AC 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: Multiple hydrophobic absorbent mats and booms have been installed adjacent to the point of spill/release discovery and intermittently extend approximately 260 feet downstream. Filtrex/green sediment control wattles have also been installed and are not appropriate to address petroleum hydrocarbon fluids. The majority of booms have not been properly installed to cover the width of Little Dry Creek and prevent the spread of impacts downstream in multiple locations; multiple mats have been displaced or crumpled by ice/snow; mats and booms do not adequately intercept the flow of Little Dry Creek. Little Dry Creek was partially frozen at the time of inspection. A hydrocarbon sheen was visible on the water surface within Little Dry Creek extending approximately 170 feet downstream of the spill/release point (to the northeast). ECMC confirmed the presence of a hydrocarbon sheen by disturbing the water and observing the smooth silver rainbow sheen pull apart then quickly join back together.

Corrective Action: Operator shall ensure booms and other controls are properly installed, maintained, and replaced to prevent ongoing spread of impacts downstream. When installed properly booms must completely cover the surface of the stream perpendicular to flow. Booms should be inspected daily and replaced when saturated to prevent desorption. Operator shall implement, 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.CA backtracked to FIR Document #697602609.

Date: 01/26/2026

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)
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Oily Soil		Inadequate		
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Comment: Due to the sensitive nature of this location, on-location storage of E&P waste, including in stockpiles, is not acceptable. One impacted stockpile has been hauled off location. No liner or other BMPs to prevent runoff were observed at the other stockpiles. The remaining soil stockpile had visible impacts and strong hydrocarbon odor. Black staining was observed where the first impacted stockpile was located.

Corrective Action: E&P Waste shall properly store, handle, transport, treat, recycle, or dispose of waste per Rule 905. In addition, Operator shall provide waste transportation and final disposition information in accordance with 905.b.(3) for all E&P waste transported off site.
CA backtracked to FIR Document #697602609.

Date: 02/03/2026

Spill/Remediation:

Comment: Stained impacted soil with strong hydrocarbon odor was observed slightly upstream of the presumed release point on the western bank of the creek (approximately 40.07694, -104.88617) and has not been addressed. Black stained soil was observed in situ (approximately 40.07759, -104.88618), in a trench dug up by the Operator. ECMC Staff sampled the soil and submitted it to a lab for Table 915-1 Organics. A hydrocarbon sheen was observed on the surface water of the creek just beyond the boom (40.07920, -104.88496).

Corrective Action: In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered.
CA backtracked to FIR Document #697602609.

Date: 02/03/2026

Emission Control Burner (ECB): _____

Comment: _____

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

Comment	User	Date
<p>Note the following COAs from the Form 19 - Initial Report, Document No. 404517626. These COAs remain applicable and must be addressed immediately.</p> <p>1) Operator did not contact Area EPS after initial Spill. Operator shall add area EPS Alexander Ahmadian for all reporting related to this spill. Operator has still not added EPS Alexander Ahmadian in the latest Form 19 submittal (Document #404526443). In addition, Operator will provide notice to ECMC area EPS Alexander Ahmadian (alexander.ahmadian@state.co.us) and DJ Basin Environmental Supervisor Nikki Graber (nikki.graber@state.co.us) via email at least 48 hours prior to backfill, soil boring, monitoring well installation, or any sampling events performed on location. Email notification must include the scope of work, start date and time, and contact information for the on site contact.</p> <p>2) Operator shall provide daily monitoring logs of the entire surface water stretch between the point of release and the point of compliance. Monitoring shall be documented on a field log by a qualified environmental technician noting weather conditions, stream flow, observations of sheen or free product, observations of vegetation and wildlife.</p>	ahmadiia	02/05/2026

Attached Documents

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

Document Num	Description	URL
404534860	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7440928
697602612	20260202_Photolog	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7440925
697602614	20260203_Photolog	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7440926