

**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:

12/31/2025

Submitted Date:

02/10/2026

Document Number:

697602621

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:

- 11 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
Brown, Kari		kari.oakman@state.co.us	
Motisi, Dan		dmotisi@kpk.com	KPK environmental
Kirschner, Steven		steven.kirschner@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Watzman, Ross		rwatzman@kpk.com	KPK
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Chew, Cullen		cchew@kpk.com	KPK environmental

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479610	Flowline System	AC	03/12/2021		-	Facility 7 Consolidation	EI
484274	SPILL OR RELEASE	CL			-	David Howard Flowline Release	EI

General Comment:

This is an environmental inspection to determine progress on Spill ID 484274. Any corrective actions from previous inspections 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.

NOAV Document #403704306 was issued on 02/29/2024:

"Pursuant to Rule 912.b.(6), no later than 90 days after a Spill or Release is discovered, KP Kauffman Company, Inc. ("Operator") will have submitted, and obtained the Director's approval of either: A. A Form 19 – Supplemental requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or B. A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.

On April 15, 2023 Operator submitted an Initial Form 19, Spill/Release Report (document no. 403374685) for the David Howard Flowline Release (Spill/Release Point ID: 484274) of produced water and oil from the Facility 7 Consolidation Flowline (Facility ID: 479610). On this Form 19 Operator Reports the date of spill discovery as April 13, 2023.

As of February 26, 2024, Operator has not submitted a Supplemental Form 19 Spill/Release Report requesting closure of the release.

Operator failed to submit a Form 19 - Supplemental Spill/Release Report requesting closure no later than 90 days after the discovery of a Spill or Release, violating Rule 912.b.(6)."

Location

Overall Good:

Signs/Marker:

Type	OTHER		
Comment:	Signage at the site is illegible and therefore inadequate.		
Corrective Action:	Install sign to comply with Rule 605.	Date:	03/12/2026

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	TRASH		
Comment:	Trash and other debris are being stored near the spill location.		
Corrective Action:	Comply with housekeeping Rule 606.	Date:	02/17/2026

Overall Good:

Spills:

Type	Area	Volume	

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type	LOCATION		
Comment:	Fencing is adequate surrounding the spill location preventing access.		
Corrective Action:		Date:	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 479610 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: 484274 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: NOAV Document #403704306 was issued on 02/29/2024. Operator failed to submit a Form 19 - Supplemental Spill/Release Report requesting closure no later than 90 days after the discovery of a Spill or Release, violating Rule 912.b.(6). The Operator has since submitted a Form 19 Document #404195683 received on 5/9/2025, requesting closure of the release. However, the Operator has not submitted a Form 27 within the approved quarterly reporting schedule and Rule 913.e.(3); the last Form 27 was received on 04/17/2025; the next quarterly report was due 07/16/2025.

Corrective Action: Operator shall immediately submit a Form 27 for Spill ID 478542/ Remediation Project #40353 that includes a specific workplan and timeline to address the remaining impacts in accordance with Rule 913.e.(3). Date: 07/16/2025

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: _____

Spill/Remediation:

Comment: No remediation efforts have been observed by ECMC staff. No laboratory analytical has been submitted for Spill ID 478542/ Remediation Project #40353.

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. In addition, 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. Date: 07/16/2025

Emission Control Burner (ECB): _____

Comment: _____

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

ECMC Comments

Comment	User	Date
NOAV Document #403704306 was issued on 02/29/2024 because the Operator failed to submit a Form 19 - Supplemental Spill/Release Report requesting closure no later than 90 days after the discovery of a Spill or Release, violating Rule 912.b.(6). Since then, the Operator has not submitted a Form 27 within the approved quarterly reporting schedule and Rule 913.e.(3); the last Form 27 was received on 04/17/2025; the next quarterly report was due 07/16/2025.	ahmadiaa	02/10/2026
This Operator is still out of compliance and has repeated violations for reporting requirements at Spill ID 478542/ Remediation Project #40353.		

Attached Documents

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

Document Num	Description	URL
404540307	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7445215
697602622	Photolog	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7445210