

**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:

02/18/2026

Submitted Date:

02/19/2026

Document Number:

714300313

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:

- 17 Number of Comments
- 9 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
Motisi, Dan		dmotisi@kpk.com	KPK environmental
Watzman, Ross		rwatzman@kpk.com	KPK
Burn, Diana		diana.burn@state.co.us	
Blakeman, Audrey		audrey.blakeman@state.co.us	
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason
Fischer, Alex		alex.fischer@state.co.us	
Chew, Cullen		cchew@kpk.com	KPK environmental
Binschus, Chris		chris.binschus@state.co.us	
,		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
241597	WELL	PR		OW	123-09386	UPRR 50 PAN AM D-1	EI
482826	SPILL OR RELEASE	CL			-	UPRR 50 Pan Am D-1	EI

General Comment:

This is an environmental inspection to by ECMC EPS Kari Brown and Environmental Supervisor Alex Fischer to determine progress on Spill ID 482826/Remediation Project No 27721. 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.

Current site status:

- An open excavation is present on location. Excavation was partially backfilled. A t-post and uncapped pipe were sticking out of the partial backfill.
- Backfill soil staged in stockpiles on location. No stormwater BMPs were present. Concrete and trash were observed in both the backfill stockpiles and in the backfilled portion of the excavation.
- A small amount of soil remains in the former soil stockpile area. The liner that the soil is stored on has been torn and weeds are present throughout the stockpile area.
- Excavation and soil stockpiles are surrounded by cattle panels. Livestock is present on location.
- Trash present in the open excavation, in the stockpiled backfill soil, and in the contaminated soil stockpile area.
- Stained soil was observed at the UPRR 50 Pan Pam D#1 wellhead and surrounding area.
- Operator has not provided documentation that this spill has been remediated to Table 915-1 Cleanup Concentration. No Form 27 has been submitted for this location since November 11, 2022 (Doc No 403225048).
- Spill is located in a Bald Eagle Active Nest Site Half Mile HPH; seasonal nesting restrictions are active.

See attached corrective actions.

Location			
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____
Good Housekeeping:			
Type	TRASH		
Comment:	Trash present in the open excavation, in the stockpiled backfill soil, and in the contaminated soil stockpile area.		
Corrective Action:	Comply with Rule 606		Date: <u>02/26/2026</u>
Type	WEEDS		
Comment:	Weeds present on excavation sidewalls and throughout former soil stockpile area.		
Corrective Action:	Comply with Rule 606.		Date: <u>02/26/2026</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Comment:	Stained soil present at the wellhead and surrounding area		
Corrective Action:	Comply with ECMC Rules. Operator shall immediately control and contain spills/releases and investigate, clean up and document impacts per Rule 912.a. Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts (photo documentation and waste disposal manifests) to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR. Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.		Date: <u>02/26/2026</u>
In Containment: <u>No</u>			
Comment: 			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type			
Comment:	Cattle fencing surrounds open excavation and former E&P Waste staging area.		
Corrective Action:			Date: _____
Equipment:			
Type: Flow Line #			corrective date
Comment:	A portion of the flowline is visible within the open excavation; the majority of the flowline has been covered by backfill.		
Corrective Action:	Comply with ECMC 1100 Series Rules -Repair all flowlines intended for return to service per Rule 1102.j. -For shut-in or out of service off-location flowlines or crude oil transfer lines, Operator shall comply with Rule 1102.o. -For flowlines being abandoned, Operator shall comply with ECMC Rule 1105 -Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per Rule 1102.j.7 -Historically abandoned/out of service flowlines exposed in the excavation must be abandoned per ECMC Rule 1105 (ends sealed per Rule 1105.e.4) Provide confirmation documentation of completion (photos) to ECMC Integrity Inspector and Engineer.		Date: <u>02/26/2026</u>

Type: Other	#		
Comment:	An uncapped pipe is visible sticking out of partially backfilled portion of the open excavation.		
Corrective Action:	Operator shall comply with Rule 608.e.		Date: 02/26/2026

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities

Facility ID: 241597 Type: WELL API Number: 123-09386 Status: PR Insp. Status: EI

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

Facility ID: 482826 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: Excavation on location has been partially backfilled. A t-post and uncapped pipe were sticking out of the partial backfill. Backfill material includes concrete. Operator has not provided documentation that this spill has been remediated to Table 915-1 standards.

Corrective Action: Immediately submit a Form 27 documenting cleanup to Table 915-1 standards and justifying backfill at this location. Date: 02/19/2026

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)	
	Comment	Stockpile has been removed from location, however the liner under the stockpile is still on location and is torn in various spots.			
	Corrective Action	Prior to spill/remediation closure Operator will collect soil samples from underneath the observed soil stockpile area. Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.			Date: _____

Spill/Remediation:

Comment: Quarterly reporting is required for Remediation Project #27721. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on November 11, 2022 (Doc # 403225048).

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule. Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated. This location was included in NOAV #403513701 for violation of Rule 913.e.(3) Date: _____

Emission Control Burner (ECB): _____

Comment:

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

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment **Backfill soil staged in stockpiles on location. No stormwater BMPs were present. Concrete and trash were observed in both the backfill stockpiles and in the backfilled portion of the excavation. Concrete and trash cannot be used as backfill material.**

Corrective Action **Concrete must be disposed of in accordance to Rule 906 following CDPHE's Solid and Hazardous Waste Commission solid waste guidelines and may not be used as backfill material. Remove backfill material from location, including concrete and material that has already been used as backfill material within the open excavation.**

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____
 1003c. Compacted areas have been cross ripped? _____
 1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
 Cuttings management: _____
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
 Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____
 TRANSECT RESULTS OF REFERENCE AREA% _____
 TOTAL % OF DESIRABLE VEGETATION COVER _____
 VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment

Corrective Action

Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____
 TRANSECT RESULTS OF REFERENCE AREA% _____
 TOTAL % OF DESIRABLE VEGETATION COVER _____
 VEGETATIVE COVER _____

Comment:

Corrective Action:

Date _____

Overall Final Reclamation _____ Well Release on Active Location Multi-Well Location

ECMC Comments

Comment	User	Date
<p>Operator notified ECMC via email on 2/18/2026 that the excavation on location was being backfilled. ECMC informed Operator that the spill excavation is located in a Bald Eagle Active Nest Site Half Mile HPH and required Operator to stop activities at the location until CPW consult (see attached correspondence 1).</p> <p>ECMC notified Operator via email that backfill must immediately stop at this location until inappropriate backfill is removed from location, uncapped piping is addressed, and a Form 27 has been submitted documenting compliance with Table 915-1 standards (see attached correspondence 2).</p>	oakmank	02/19/2026

Attached Documents

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

Document Num	Description	URL
404551767	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7456136
714300314	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7456133
714300315	Correspondence 1	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7456134
714300316	Correspondence 2	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7456135