

**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:

02/09/2026

Submitted Date:

02/26/2026

Document Number:

718300110

FIELD INSPECTION FORM

Loc ID 476014 Inspector Name: Anderson, Laurel 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:

- 14 Number of Comments
- 8 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
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Brown, Kari		kari.oakman@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
239827	WELL	PA		OW	123-07615	COSSLETT 1	PA
318531	LOCATION	CL			-	COSSLETT-61N68W 2SENE	EI
476014	LOCATION	AC			-	Cosslett 1, 2	EI
476037	OFF-LOCATION FLOWLINE	AC	06/06/2025		-	Cosslett 1, 2	EI
476049	OFF-LOCATION FLOWLINE	AC	06/06/2025		-	Cosslett 1, 2	EI
490349	TANK BATTERY	AC	05/29/2025		-	Cosslett 1,2 Tank Battery 490349	EI
491039	SPILL OR RELEASE	CL	07/24/2025		-	Cosslett 1,2 Separator Historical	EI

General Comment:

On February 9th, 2026, ECMC Environmental Protection Specialists Kari Brown and Laurel Anderson performed a routine environmental inspection to determine progress on KP Kauffman's Company Inc's (Operator) Cosslett 1,2 Separator Historical release (Spill ID 491039/REM 41125) and a historic release at the Cosslett 1 wellhead (API 123-07615) reported under Denied Form 19i Doc #404475636. 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 on location at the time of this field inspection. Photos attached to document site conditions.

Spill ID: 491039

Spill Name: Cosslett 1,2 Separator Historical

Reported Date of Discovery: 7/24/2025

Date of Inspection: 2/9/2026

Related Tank Battery: Cosslett 1,2 Tank Battery (Facility ID 490349)

Related Location : Cosslett 1, 2 (Location ID 476014)

Related Remediation Project No: 41125 (Decommissioning of Cosslett 1&2 Tank Battery & remediation of Spill ID 491039),

Spill ID: TBD

Spill Name: Cosslett 1 Wellhead

Reported Date of Discovery: 12/15/2025

Form 19is Doc No: 404475636 (DENIED)

Date of Inspection 2/9/2026

Related Location ID: 317708

Related Well (API): Cosslett 1 (API 123-07615)

Related Remediation Project No: 41123 (Decommissioning of Cosslett 1 well and flowline & remediation of a historic release at the wellhead reported under Denied Form 19i Doc #404475636).

Other related wells:

-Cosslett 2 (API 123-09303) - Not inspected due to active construction activity

Related Remediation Project Nos:

-41133 (Decommissioning of Cosslett 2 well and flowline & associated Spill) - Not inspected due to active construction activity

The Cosslett 1 Wellhead release and Cosslett 1,2 Separator Historical (Spill ID: 491039) are located within:

-the City of Dacono & an active construction site

-150' and 200' of a freshwater emergent wetland, respectively

-75' and 120' of surface water and a riverine wetland

-a quarter mile of multiple occupied structures (residences), multiple roads and right-of-ways (CO RD 11, State Highway 52, and multiple local roads), active development & the Town of Frederick

Current site status:

-An excavation near the former separator was open at the time of inspection. Hydrocarbon stained soil was observed along the sidewalls of the excavation (See Photos 8, 13 & 14).

-Inadequate fencing - Orange construction fencing has been installed around a portion of the open excavation; However, fencing is discontinuous and does not encompass the entire perimeter of the excavation, has been installed too close to the near vertical western sidewall and has started to fall/sag (See photos: 6, 8-9, & 13-14).

-Portions of the excavation have steep (near vertical) sidewalls that at the time of inspection had not been sloped or benched and did not appear stable [i.e. sidewall sloughing as evidenced by failed soil mass observed in base of excavation adjacent to sidewall (See photo: 6)].

-Unused equipment (disconnected segment of flowline) was observed on location within the southern end of the open excavation (See photo: 8).

-Additionally, multiple sections/pieces of flowlines of various materials and diameters were observed on location. Several steel flowlines stored with oily soil appear corroded and have visible holes (ranging in size) throughout the length of the lines. The majority of holes observed appear to be from corrosion not punctures during flowline removal activities. Corrosion related holes had rough, irregular edges with brown/black discoloration around the hole. Other sections of both the exposed and mud coated steel lines appeared to be stained by iron oxide (See photo 5).

-A small (less than three foot) section of ~3" fiberglass flowline was observed on location on top of an unlabelled soil stockpile (See photo 10).

Continued - See Inspector/Comment

Location			
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:	No signage/emergency contact number observed on location. Sign/emergency contact info not posted at open excavation.		Date:
Corrective Action:			
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (disconnected segment of flowline) was observed on location within the southern end of the open excavation (See photo: 8). Multiple sections/pieces of flowlines of various materials and diameters were observed on location (See photo 5). A small (less than three foot) section of ~3" fiberglass flowline was observed on top of an unlabelled soil stockpile (See photo 10).		
Corrective Action:	Comply with Rules 606, 905.e. and 1002.f.(2).D. Operator shall properly store, handle and dispose of unused equipment/E&P waste in accordance with Rule 606.a. & 905.e. Operator shall conduct self-inspections and maintain good housekeeping procedures in accordance with Rule 1002.f.(2).D. - These procedures shall include measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal practices.		Date: 03/05/2026
Type	DEBRIS		
Comment:	Trash/Debris/Potential E&P waste was observed on the former Cosslett 1 Well pad - including numerous (over 50) chunks of cement scattered across the location and two large, tattered pieces of black liner on location (See photos 11-12).		
Corrective Action:	Operator shall properly store and dispose of waste. For E&P waste: Properly dispose of oily waste in accordance with 905.e. For non E&P waste: Handle waste in accordance with Rule 906.		Date: 03/05/2026
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
PW/CO	Separator		
Comment:	Portions of the Cosslett 1,2 Separator Historical release (Spill ID: 491039) excavation have steep (near vertical) sidewalls that at the time of inspection had not been sloped or benched and did not appear stable [i.e. sidewall sloughing as evidenced by failed soil mass observed in base of excavation adjacent to sidewall (See photo: 6)].		
Corrective Action:	Operator shall provide at minimum 48-hour notice via email to ECMC DJ Basin Environmental Supervisor Nikki Graber and the Area EPS prior to any sampling, soil boring or monitoring well installation and/or further excavation/backfill activities performed on location. Additionally, Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. CA due date listed as the date 48-hour notice was applied. This corrective action shall apply to both Remediation Project 41123 and Remediation Project 41125 until No Further Action is granted.		Date: 02/26/2026
In Containment: No			
Comment: <input style="width: 100%;" type="text"/>			
<input checked="" type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		

Comment:	Orange construction fencing has been installed around a portion of the open excavation; However, fencing is discontinuous and does not encompass the entire perimeter of the excavation, has been installed too close to the near vertical western sidewall and has started to fall/sag (See photos: 6, 8-9, & 13-14). Portions of the excavation have steep (near vertical) sidewalls that at the time of inspection had not been sloped or benched and did not appear stable [i.e. sidewall sloughing as evidenced by failed soil mass observed in base of excavation adjacent to sidewall (See photo: 6)].		
Corrective Action:	Operator shall immediately install, repair 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/schools, roadways, depth of excavation, presence of ground or surface water, livestock, wind, etc. Ongoing issue - CA Due date back dated to previous FIR Doc #697602601.	Date:	01/28/2026

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities				
Facility ID: <u>239827</u>	Type: <u>WELL</u>	API Number: <u>123-07615</u>	Status: <u>PA</u>	Insp. Status: <u>PA</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>318531</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>CL</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>476014</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>476037</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>476049</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>490349</u>	Type: <u>TANK</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				
Facility ID: <u>491039</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>CL</u>	Insp. Status: <u>EI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12				

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: A historic release at the wellhead was reported on Form 19is Doc #404475636 (attached) received on 12/16/2025; However, the Form 19is Denied due to inadequate reporting and a replacement Form 19 has not been received.

Corrective Action: Operator shall submit a replacement Form 19i with the required information and documentation immediately. CA due date backdated to reported date of discovery. Date: 12/15/2025

Reportable: YES GPS: Lat 40.085300 Long -104.962700

Proximity to Surface Water: 75 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)
Oily Soil	Piles	Inadequate	
Comment	An oily soil (E&P waste) stockpile labeled "CONTAMINATED" was observed on location, to the east of the excavation and access ramp. The majority of oily waste is stockpiled on liners; however, the liners do not appear to extend beneath the entire area of the stockpile and stockpiled E&P waste (oily soil) appears to be toppling over the discontinuous perimeter berm surrounding portions of the stockpile. E&P waste has spilled and spread outside the lined portions of the stockpile (See Photos: 1-5, 7, 9 & 14).		
Corrective Action	Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts not previously submitted to the next Supplemental Form 27 per Rule 905.b.(3). Additionally, Operator shall manage waste in compliance with Rule 913.b.(5)B 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. Operator shall collect soil samples from the areas where impacted soil has spilled outside containment Full Table 915-1 Contaminants of Concern. Operator shall include this scope of work via Supplemental Form 27 for Remediation Project #41125 as soon as possible but no later than EOB day 3/6/2026.		Date: <u>03/06/2026</u>

Spill/Remediation:

Comment: Remediation Project #41125 was created for decommissioning of the Cosslett 1,2 Tank Battery 490349. Spill ID 491039 was closed on 7/24/2025 with continued site investigation and remediation of the spill being reported under Remediation Project #41125. Remediation Project #41123 was created for decommissioning of the Cosslett 1 wellhead and associated off-location flowline. Quarterly reporting is required for both Remediation Projects; the last Form 27 for each project were the Initial Form 27s which were both approved on 7/1/2025.

Corrective Action: As of 2/26/2026 Operator has not submitted a Supplemental Form 27 for either remediation project and is 150 days late on quarterly reporting for both Remediation Project #41123 and Remediation Project #41125. Operator shall submit Quarterly Updates for these remediation projects every 90 days as required by Rule 913.e.(3). CA due date backdated to when the Supplemental Form 27s were due. Date: 09/29/2025

Emission Control Burner (ECB): _____

Comment: _____

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

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Soil has been stockpiled on location without adequate BMPs. -One soil stockpile labeled "CLEAN" soil was observed on location, adjacent to the west side of the excavation access ramp with no BMPs (See Photos: 1, 5, 7, 13 & 14) .
 -Multiple other soil stockpiles were observed on location without signage or BMPs (See Photos: 6, 10, 13 & 14)

Corrective Action: Oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Install BMPs in accordance with Rule 1002.f.(2).

Date: 03/05/2026

Pits: NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
-Trash/Debris/Potential E&P waste was observed on the former Cosslett 1 Well pad - including numerous (over 50) chunks of cement scattered across the location and two large, tattered pieces of black liner on location (See photos 11-12) -An oily soil (E&P waste) stockpile labeled "CONTAMINATED" was observed on location, to the east of the excavation and access ramp. The majority of oily waste is stockpiled on liners; however, the liners do not appear to extend beneath the entire area of the stockpile and stockpiled E&P waste (oily soil) appears to be toppling over the discontinuous perimeter berm surrounding portions of the stockpile. E&P waste has spilled and spread outside the lined portions of the stockpile (See Photos: 1-5, 7, 9 & 14) -One soil stockpile labeled "CLEAN" soil was observed on location, adjacent to the west side of the excavation access ramp with no BMPs (See Photos: 1, 5, 7, 13 & 14) . -Multiple other soil stockpiles were observed on location without signage or BMPs (See Photos: 6, 10, 13 & 14) -No signage/emergency contact information was observed on location. -A third party meter shed remains on location (See Photos 6 and 14). Note: Photographs contain a typographical error; Should read Cosslett not Cosslet. See attached corrective actions.	andersoln	02/26/2026

Attached Documents

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

Document Num	Description	URL
718300111	Cosslett 1 & 2 Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7463042
718300112	Cosslett 1 Wellhead Form19is_404475636-DENIED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7463043