

**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:

04/13/2026

Submitted Date:

04/15/2026

Document Number:

717100522

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: Rollins, Grace 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
- 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
Freese, Steve		steve.freese@state.co.us	All SLB Inspections
Graber, Nikki		nikki.graber@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Burn, Diana		diana.burn@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
,		cogcc@kpk.com	All Inspections
Deranleau, Greg		greg.deranleau@state.co.us	
Motisi, Dan		dmotisi@kpk.com	KPK environmental
Kirschner, Steven		steven.kirschner@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
487984	SPILL OR RELEASE	CL			-	Dechant State 3 Flowline	EI

General Comment:

ECMC Field Inspection Report Summary

This is an environmental inspection to determine progress on Spill ID 487984 and Remediation Project # 39579. 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.

Site/Spill Name: Dechant State 3 Flowline

Spill ID: 487984

Remediation Project #: 39579

Flowline Facility ID: 475722

Reported Date of Discovery: 09/20/2024

Date of Inspection: 04/13/2026

Weather: Partly cloudy, 62°F

Spill is located within State Land Board managed land.

Current site status:

- Operator equipment (excavator, loader, pickup truck) was on location; no Operator personnel were on location at the time of the inspection.
- Excavation remains open.
- No stormwater BMPs have been installed at the excavation.
- A strong petroleum hydrocarbon odor was observed throughout the location.
- Stained soil is visible in situ.
- Black fluid presumed to be free product is visible at the base of the deepest areas of the excavation.
- The excavation deepens towards the north (source of Spill). ECMC staff approximate the excavation to be over 20 ft at its deepest point.
- Soil has sloughed off excavation sidewalls. Colluvium is visible at bases of sidewalls.
- Portions of flowline are visible protruding from the excavation sidewalls.
- Orange construction fencing surrounds the excavation, sans at an egress.
- Oily waste (soil) labeled "contaminated" is stockpiled in two areas on location. The majority of oily waste is stockpiled on liners; however, the liners are discontinuous and/or have been driven over. Oily waste has spilled and spread outside of the lined areas. Stormwater BMPs are inadequate.
- Areas of the eastern contaminated stockpile are lithifying; bedding planes are visible.
- A soil stockpile labeled "clean" is visible immediately adjacent to stockpiled oily waste labeled "contaminated".
- Trash is visible within the "clean" soil stockpile. No liner or stormwater BMPs have been installed.
- Localized areas of stained soil are visible outside of the excavation.
- Weeds are visible on the colluvium within the excavation and on the soil stockpiles.
- E&P waste (piece of flowline) is visible on location.

See attached corrective actions.

Location			
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____
Good Housekeeping:			
Type	TRASH		
Comment:	Trash is visible in multiple areas of the location, including within the "clean" soil stockpile.		
Corrective Action:	Comply with good housekeeping Rule 606.		Date: <u>04/22/2026</u>
Type	DEBRIS		
Comment:	Debris has collected within the excavation.		
Corrective Action:	Comply with good housekeeping Rule 606.		Date: <u>04/22/2026</u>
Type	WEEDS		
Comment:	Weeds throughout the location including within and outside of the excavation and on soil stockpiles. This remains unaddressed from the previous inspections.		
Corrective Action:	Comply with good housekeeping Rule 606. CA date from Insp Doc No 718300022.		Date: <u>07/24/2025</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Comment:	Localized areas of stained soil are visible outside of the excavation.		
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>05/15/2026</u>
In Containment: No _____			
Comment: 			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Orange construction fencing surrounds the excavation, sans at an egress. As previously documented in multiple Field Inspection Reports, per the landowner, either a three strand barbed wire fence or a hot wire fence that will completely exclude the livestock from any of the contaminated soils is required. Plastic "snow" fencing will not be sufficient to keep livestock away from the contaminated area. This remains unaddressed from previous inspections and NOAV Doc No. 404544054.		
Corrective Action:	Operator will install and maintain three strand barbed wire fence or a hot wire fence which completely excludes livestock from the open excavation and any of the contaminated soils at the Spill location in compliance with Rule 913.b.(5).B.i until the excavation backfill has been completed. CA date from Insp Doc No. 710100264.		Date: <u>09/25/2024</u>
Equipment:			
Type: Flow Line	#		corrective date
Comment:	Portions of flowline are visible protruding from the excavation sidewalls.		
Corrective Action:			Date:

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 487984 Type: SPILL OR API Number: - Status: CL Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: A strong petroleum hydrocarbon odor was observed throughout the location. Stained soil is visible in situ. Black fluid presumed to be free product is visible at the base of the deepest areas of the excavation. The excavation deepens towards the north (source of Spill). ECMC staff approximate the excavation to be over 20 ft at its deepest point. Soil has sloughed off excavation sidewalls. Colluvium is visible at bases of sidewalls.

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. Operator will immediately resume active remediation of the impacts from Spill ID 487984. Operator will submit a Form 27 Supplemental Site investigation and Remediation Workplan for Remediation Project No 39579 with all outstanding documentation and a workplan and timeline for remediating impacts resulting from Spill ID 487984.

Date: _____

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	Oily E&P waste labeled "contaminated" is stockpiled in two areas on location. The majority of oily waste is stockpiled on liners; however, the liners are discontinuous and/or have been driven over. Oily waste has spilled and spread outside of the lined areas. Stormwater BMPs are inadequate. Areas of the eastern contaminated stockpile are lithifying; bedding planes are visible. A soil stockpile labeled "clean" is visible immediately adjacent to stockpiled oily waste labeled "contaminated"; BMPs are inadequate. Trash is visible within the "clean" soil stockpile. This remains unaddressed from previous inspections and NOAV Doc No. 404544054.		
Corrective Action	Operator will immediately remove and properly dispose all stockpiled oily waste from Spill ID 487984. CA due date from NOAV Doc No. 404544054.		Date: <u>02/12/2026</u>

Spill/Remediation:

Comment: Quarterly reporting is required for Remediation Project #39579. Operator is past due on quarterly reporting. The last Supplemental Form 27 was received on March 14, 2025 (Doc # 404116584). This remains unaddressed from previous inspections and NOAV Doc No. 404544054.

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (90 days). Operator will submit a Form 27 Supplemental Site investigation and Remediation Workplan for Remediation Project No 39579 with all outstanding documentation and a workplan and timeline for remediating impacts resulting from Spill ID 487984.

Date: _____

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: Inadequate BMPs in place to control wind erosion and stormwater run-on and runoff. Contaminated soil remains in situ and stored on location without adequate BMPs. Excavation sidewalls are unstable; soil continues to slough off excavation sidewalls onto the floor of the excavation. Rill formation and colluvium indicate soil (including E&P waste) has been eroded by stormwater runoff & wind erosion and deposited throughout the location & into the open excavation. This remains unaddressed from previous inspections.

Corrective Action: Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Install BMPs in accordance with 1002.f.(2) to prevent runoff and completely contain impacts. CA date from Insp Doc No. 710100264.

Date: 09/25/2024

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
404620551	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7515006
717100523	ECMC Photo Log - Dechant State 3 Flowline - 4.13.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7515004
717100524	Remediation Status Attachment - Dechant State 3 Flowline - 4.13.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7515005