

**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:

03/24/2026

Submitted Date:

04/27/2026

Document Number:

717100501

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:

- 10 Number of Comments
- 5 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
Lily Clark	(303) 825-4822 x150	lclark@kpk.com	Principal Agent
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
,		cogcc@kpk.com	All Inspections
Kirschner, Steven		steven.kirschner@state.co.us	
Blakeman, Audrey		audrey.blakeman@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Chew, Cullen		cchew@kpk.com	KPK environmental
Burn, Diana		diana.burn@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
493326	SPILL OR RELEASE	AC			-	Facility S4WB Sales Line	EI

General Comment:

ECMC Field Inspection Report Summary

This is a combined, multi-day environmental inspection to determine progress on Spill ID 493326. 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 attached to document site conditions.

Spill Name: Facility S4WB Sales Line

Spill ID: 493326

Flowline Facility ID: 478841

Operator Reported Date of Discovery: 02/26/2026

Date Operator Discovered Flowline Leak: 02/25/2026

Dates of Inspection: 03/24/2026, 03/25/2026, 03/31/2026, 04/13/2026

Spill is located within or adjacent to:

-The Town of Frederick

-Sullivan Ditch and Riverine Wetlands (~35 ft east)

-Zimmerman Drive and I-25 Frontage Road (~160 ft south and ~160 ft east, respectively)

Site status as of 03/24/2026:

-Sullivan Ditch was dry at the time of the inspection.

-An excavation remains open at this spill location.

-Stained soil is visible in situ.

-Groundwater with free product is visible at the base of the excavation at the spill location.

-Two flowlines are visible within the excavation.

-Orange construction fencing partially surrounds the excavation.

-Two soil stockpiles are visible on location, one marked "clean" and one marked "contaminated". A liner is visible under the contaminated stockpile but has been overtopped by soil in some areas. No stormwater BMPs are visible at the clean stockpile.

-Operator personnel and equipment were on location at the time of inspection. Operator personnel were using a hydrovac to skim free product off of groundwater at the base of the excavation.

Site status as of 03/25/2026:

-Overall site conditions are similar to 03/24/2026.

-Additional liner has been added and the previously documented stockpile marked "contaminated" has been expanded.

-Operator personnel and equipment were on location at the time of inspection. Operator personnel were adding additional soil to the contaminated stockpile, driving equipment over the liner at the time of the inspection.

Site status as of 03/31/2026:

-Overall site conditions are similar to 03/31/2026.

-ECMC staff estimate the depth of the excavation/depth to groundwater to be approximately 11-12 feet. In accordance with ECMC safety procedures, ECMC inspector did not enter the excavation.

-There were no operator or contract environmental personnel on location at the time of this field inspection.

Site status as of 04/13/2026:

-Overall site conditions are similar to 03/31/2026.

-Sullivan Ditch was running (north to south) at the time of the inspection.

-ECMC staff estimate the depth to groundwater within the excavation to be approximately 9-10 feet. In accordance with ECMC safety procedures, ECMC inspector did not enter the excavation.

-Much of the soil has been removed from the contaminated stockpile. Some stockpiled, contaminated soil and the liner remain on location. No stormwater BMPs are visible at the clean stockpile.

-There were no operator or contract environmental personnel on location at the time of this field inspection.

See attached corrective actions.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good:

Spills:

Type	Area	Volume			

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type OTHER

Comment: Orange construction fencing partially surrounds the excavation; yellow caution tape has been installed across a gap in the construction fencing.

Corrective Action: Secure access to excavation in accordance with Rule 913.b.(5).B.i and ECMC Guidance 913.b.(5)B i-v.

Date: 04/27/2026

Equipment:

corrective date

Type: Flow Line

#

Comment: Two flowlines are visible within the excavation. Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. See Engineering Field Inspection Report Document # 717100490.

Corrective Action:

Date:

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Location Construction

Location ID: 493326 CDP: _____

Comment: _____

Corrective Action: _____

Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____

Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____

Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present

Comments: Erosion BMPs: **No stormwater BMPs are visible at the clean stockpile.**

Other BMPs: _____

Corrective Action: **Install BMPs in accordance with 1002.f.(2) to prevent potential runoff.** Date: 04/27/202

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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: 493326 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)
	Other		
Comment	Much of the soil has been removed from the contaminated stockpile.		
Corrective Action	<p>In accordance with Rule 905.b.(3) Any Operator that generates E&P Waste that is transported off-site will maintain, for not less than 5 years, copies of each invoice, bill, or ticket, and such other records as necessary to document the requirements listed in Rules 905.b.(3).A–F.</p> <p>Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal. Operator shall provide these manifests via email to EPS Grace Rollins (grace.rollins@state.co.us), DJ Basin Region Environmental Supervisor Nikki Graber (nikki.graber@state.co.us), and Environmental Manager Audrey Blakeman (audrey.blakeman@state.co.us) by May 1, 2026.</p>		Date: 05/01/2026
	Piles		
Comment	<p>Much of the soil has been removed from the contaminated stockpile. Some stockpiled, contaminated soil and the liner remain on location.</p> <p>Per correspondence with the LGD of The Town of Frederick (surface owner), soil stockpiles are not approved at this location.</p>		
Corrective Action	<p>Operator shall comply with Rule 913.b.(5).B.iv. and properly store, handle, and manage all E&P Waste to prevent contamination of stormwater, surface water, Groundwater, and soil.</p> <p>Per the COA on Form 19 Document # 404560685, on-location storage of E&P waste, including in stockpiles, is not acceptable. CA due date backlisted to the date Form 19 Document # 404560685 was approved.</p> <p>Operator shall IMMEDIATELY resume removal of all E&P Waste from the location.</p>		Date: 03/02/2026

Spill/Remediation:

Comment:	Spill ID 493326 was created to address the remediation of impacts identified at the Facility S4WB Sales Line. An excavation has been opened at this spill location. Stained soil is visible in situ. Groundwater with free product is visible at the base of the excavation at the spill location. ECMC staff estimated the depth to groundwater to be approximately 11-12 feet when the Sullivan Ditch was dry and 9-10 feet when the Sullivan Ditch was running. In accordance with ECMC safety procedures, ECMC inspector did not enter the excavation.		
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.		Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

Attached Documents

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

Document Num	Description	URL
717100502	ECMC Photo Log - Facility S4WB Sales Line - 03.24.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7527148
717100503	ECMC Photo Log - Facility S4WB Sales Line - 03.25.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7527149
717100514	ECMC Photo Log - Facility S4WB Sales Line - 03.31.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7527150

717100519	ECMC Photo Log - Facility S4WB Sales Line - 04.13.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7527151
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