

**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:

03/25/2026

Submitted Date:

04/27/2026

Document Number:

717100512

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: _____ On-Site Inspection
Rollins, Grace _____ 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
Motisi, Dan		dmotisi@kpk.com	KPK environmental
Burn, Diana		diana.burn@state.co.us	
,		cogcc@kpk.com	All Inspections
Clark, Lily	(303) 825-4822 x150	lclark@kpk.com	Principal Agent
MacLaren, Joe		joe.maclaren@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Peterson, Tom		tom.peterson@state.co.us	
Chew, Cullen		cchew@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	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
317803	LOCATION	AC			-	PETE MONTOYA B-62N67W 35SWNW	EI
478288	TANK BATTERY	AC	10/14/2020		-	Pete Montoya B	EI
493337	SPILL OR RELEASE	AC			-	Pete Montoya B Sales Line	EI

General Comment:

ECMC Field Inspection Report Summary

This is an environmental inspection to determine progress on Spill ID 493337. Tank Battery Facility ID 478288 and Location ID 317803 were also included in the scope of this inspection. 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: Pete Montoya B Sales Line Spill

Spill ID: 493337

Reported Date of Discovery: 3/2/2026

Pete Montoya B tank battery (Facility ID 478288)

PETE MONTOYA B-62N67W35SWNW location (Location ID 317803)

Date of Inspection: 03/25/2026

Weather: Sunny, 82°F

Site/Spill is located within or in close proximity (within ¼ mile) of:

- Fort Lupton Municipality (within)
- Surface waters (multiple)
- Wetlands (Riverine (350' SE) and Freshwater Emergent (600' SE))
- Occupied structures (multiple residences - closest ~220' NNE)
- Livestock

Current site status:

- The surface owner was on location at the time of inspection.
- Per the surface owner, the Operator had not been on location for approximately two weeks.
- The excavation at the spill location was open at the time of this inspection. No work appears to have been performed on this excavation since previous Field Inspection Report (FIR) Document # 718300128.
- Multiple flowlines are exposed in the excavation.
- Orange construction fencing has been installed but does not encompass the perimeter of the excavation. Fencing around the open excavation has fallen and fencing is not adequate for site conditions (does not restrict access of surface owner's pets).
- A petroleum hydrocarbon odor was present and hydrocarbon stained soil remained visible in situ within the open excavation and at the surface.
- In accordance with ECMC safety procedures, ECMC Inspectors did not enter the excavations.
- The excavation has steep (near vertical) sidewalls that at the time of inspection had not been sloped or benched and did not appear stable.
- Hydrocarbon stained soil remains stockpiled on location with no erosion control BMPs. Pieces of torn liner were observed throughout the stockpile, no liner was observed beneath the stockpile.
- A crack was observed in the 50-bbl partially buried polyethylene produced water tank. Stained soil was observed beneath where crack was observed. The tank appears to have been damaged - as the walls are indented.
- Pitting and peeling paint was observed on the 300-bbl steel crude oil AST -Signage at the tank battery and wellhead is faded and difficult to read.
- Portions of 3-strand barbed wire fencing along the southern portion of the location have been removed.
- The surface to the south of the excavation had been scraped—hydrocarbon stained soil remained in situ at the surface.
- Weeds/debris were observed throughout the location—within, on and adjacent to the earthen secondary containment berms at the facility.
- Oily residue was observed at multiple connection/fittings on gas sales line piping and stained soil was observed below.

See attached corrective actions.

Location					
Overall Good: <input type="checkbox"/>					
Signs/Marker:					
Type	BATTERY				
Comment:	Signage is faded and difficult to read.				
Corrective Action:	Install or repair sign to comply with Rule 605. CA due date backlisted per previous FIR Document # 718300128.				Date: <u>05/19/2026</u>
Emergency Contact Number:					
Comment:	<input style="width: 100%;" type="text"/>				
Corrective Action:	<input style="width: 100%;" type="text"/>				Date: _____
Good Housekeeping:					
Type	OTHER				
Comment:	Weeds/debris were observed throughout the location.				
Corrective Action:	Comply with Rule 606. CA due date backlisted per previous FIR Document # 718300128.				Date: <u>04/03/2026</u>
Overall Good: <input type="checkbox"/>					
Spills:					
Type	Area	Volume			
In Containment: No					
Comment:	<input style="width: 100%;" type="text"/>				
<input type="checkbox"/> Multiple Spills and Releases?					
Fencing/:					
Type	OTHER				
Comment:	Orange construction fencing installed around the open excavation has fallen, does not encompass the entire perimeter of the excavation and is not appropriate for site conditions (does not restrict access of surface owner's pets).				
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, depth of excavation, presence of ground or surface water, livestock, wind, etc. CA due date backlisted per previous FIR Document # 718300128.				Date: <u>03/20/2026</u>
Equipment:					
Type: Ancillary equipment #					corrective date
Comment:	Oily residue was observed at multiple connection/fittings on gas sales line piping and stained soil was observed below. On 3/17/2026 ECMC observed oil actively dripping down piping and onto ground below at the gas sales line.				
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e. Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules. CA due date backlisted per previous FIR Document # 718300128.				Date: <u>04/04/2026</u>
Tanks and Berms:					
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	<50 BBLS	PBV PLASTIC		
Comment:	Stained soil was observed beneath a crack in the 50-bbl partially buried polyethylene produced water tank. The tank appears to have been damaged - as the walls are indented.				

Corrective Action:	Per Rule 608.f.(3) and Rule 609.a. Operator shall provide annual leak inspection/test records and documentation of all actions taken to investigate, repair/replace and remediate the malfunctioning equipment and/or process which caused damage to the 50-bbl partially buried polyethylene produced water tank. Submit as an attachment to the Form 19. Additionally, Operator shall comply with Rule 608.f.(4) which states: "If any leaks are detected, Operators will repair or replace the Tank, vessel, or structure to prevent future Spills or Releases of E&P Waste. Operators will report, investigate, and remediate any Spill or Release pursuant to Rules 912 & 913." CA due date backlisted per previous FIR Document # 718300128.	Date: 03/20/2026
---------------------------	--	-------------------------

Paint

Condition			
Other (Content)			
Other (Capacity)			
Other (Type)			

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		
Comment: 300-bbl steel crude oil AST has peeling paint and is pitted/rusted.					
Corrective Action: Inspect, maintain and repair tanks to comply with Rule 609.b. CA due date backlisted per previous FIR Document # 718300128.				Date: 04/19/2026	

Paint

Condition			
Other (Content)			
Other (Capacity)			
Other (Type)			

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:				
Corrective Action:				Date:

Venting:

Yes/No			
Comment:			
Corrective Action:			Date:

Flaring:

Type			
Comment:			
Corrective Action:			Date:

Inspected Facilities

Facility ID: 317803 Type: LOCATION API Number: - Status: AC Insp. Status: EI

Facility ID: 478288 Type: TANK API Number: - Status: AC Insp. Status: EI

Facility ID: 493337 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Spill ID 493337 was created to report and address initial spill response and remediation activities at the Pete Montoya B Sales Line Spill. The most recent Form 19 was submitted on 03/11/2026.

Corrective Action: Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date 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 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. A Form 19– Supplemental Report which requests closure of Spill ID 493337 is due by 5/31/2026. Date: 05/31/2026

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	Impacted soil remains in situ and stockpiled on location without adequate BMPs or signage despite the COA on Form 19i Doc #404562700 (approved on 3/4/2026) which states: "Due to the sensitive nature of this location, on-location storage of E&P waste, including in stockpiles, is not acceptable. Operator shall implement, continuously monitor 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."		
Corrective Action	Per the COA on Form 19s Document #404566026: "Operator shall immediately remove E&P waste stored on location in accordance with Rule 913.b.(5)B.i. and Rule 905. Operator shall provide documentation (waste manifests and photo documentation) that E&P waste stored on location has been removed within 48 hours (by 3/20/2026)."		Date: <u>03/20/2026</u>

Spill/Remediation:

Comment: A petroleum hydrocarbon odor was present and hydrocarbon stained soil remained visible in situ within the open excavation and at the surface. No work appears to have been performed on this excavation since previous Field Inspection Report (FIR) Document # 718300128. Per the surface owner, the Operator had not been on location for approximately two weeks.

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 shall IMMEDIATELY resume cleanup activities at this location. 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
404636157	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7528404

717100513	ECMC Photo Log - Pete Montoya B Sales Line Spill - 03.25.2026	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7528403
-----------	---	---