

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

05/18/2020

Submitted Date:

05/19/2020

Document Number:

697600926

FIELD INSPECTION FORMLoc ID 467175 Inspector Name: GINTAUTAS, PETER On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 46290

Name of Operator: KP KAUFFMAN COMPANY INC

Address: 1675 BROADWAY, STE 2800

City: DENVER State: CO Zip: 80202

Status Summary:

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

5 Number of Comments

3 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
,		rwatzman@kpk.com	
Kauffman, KP		cogcc@kpk.com	All Inspections
Knop, Max	303-825-4822	MKnop@kpk.com	
Allison, Rick		rick.allison@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467173	TANK BATTERY	AC	09/03/2019		-	KPK Tank Battery 28SWNE	EI

General Comment:

flowline mapping indicates battery serves four nearby wells in the NE sec. 27 2N 67W and that each of the four wells has routinely been in production over the last six months for which reports are available and subsequent to submission and approval of project 14155. Production reports available for the four wells indicated as flowing to these production facilities show produced water from 3 of the 4 wells in each of five between September 2019 and February 2020. No reports of investigations or efforts to control spills/releases from the produced water vault have been provided to COGCC subsequent to approval of project 14115

Inspection of produced water storage vessel only in the report with other production facilities last inspected 5 May2020.

battery facility (467173) and associated location (467175) were created to be able to process initial form 27 (doc 402162733). The initial form 27 submitted by the operator indicated that the site investigation would determine the impacts from overflow from the produced water vault which has been noted in previous inspections of individual wells which are served by the production facilities at the battery.

The initial 27 described that after removal of the vault and investigation and removal of impacted soils the site would have equipment installed that would be capable of preventing overflow occurrences.

The initial form 27 was approved on 30 August 2019 with anticipated implementation dates of commencement of site investigation on 16 September 2019 and commencement of remediation activities on 7 October 2019. No reports of investigations or remedial activities have been received as of the date of the inspection. Condition of approval in initial form 27 was to Submit supplemental form 27 to provide details of site investigation including site map, analytical summary and analytical reports within 45 days following start of site investigation which indicates no site investigation has been performed.

Spills/releases of unknown volumes of produced fluids were noted in 2014 (Inspection 668302427 and shown in photo attached as document 668302430) and in subsequent inspections in 2019 and 2020 (inspections 693501203, 693501282 and 699301631 and documented in photos attached to each inspection).

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐

Spills:					
Type	Area	Volume			
Produced Water		>= 5 bbls			
Comment:	spill/release is observed within berms which limit horizontal migration. No means of preventing vertical migration observed. Initial form 27 indicated preliminary investigation indicated subsurface impacts from spills/releases of produced water were present or likely present.				
Corrective Action:	Report spill or release of E&P waste or produced fluids Remove free fluids and contact COGCC EPS staff per Rule 906.b., remove free fluids within 24 hour and provide initial report of spill within 24 hours. Initial form 19 must be submitted with 72 hours (22May2020). In the initial form 19, provide a written summary of observations gathered during pot-hole investigation of subsurface conditions as was documented and discussed in initial form 27.				Date: 05/20/2020

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	<100 BBLS	CONCRETE SUMP/VAULT		,
Comment:	repeated releases of produced water from storage vessel have been noted in past inspections and in this inspection				
Corrective Action:	initiate investigation and remediation of impacts as described in approved site investigation and remediation plan (project 14115) or submit revised plan for staff review. Operator shall not use produced water vault for produced water storage until corrective actions to prevent further spills/releases from the produced water vessel have been implemented in accordance with Rule 906. If operator desires to continue use of the in-place produced water vault the operator must perform an integrity test to verify that the vault isn't leaking to the subsurface or at pipe connections prior to resuming its use. Provide a minimum of 24 hour notice to COGCC environmental specialist for this area prior to performing integrity test if operator chooses				Date: 05/26/2020

PaintCondition: Other (Content) Other (Capacity) Other (Type) **Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Insufficient	Inadequate
Comment:	Secondary containment is not sufficiently impervious to contain spilled or released materials.			

Corrective Action:	Install liner or impervious material beneath produced water vessel to ensure spill or released materials will be maintained within containment structure.	Date:	07/18/2020
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Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected FacilitiesFacility ID: 467173 Type: TANK API Number: - Status: AC Insp. Status: EI**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
402401672	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5153978
697600927	partly buried produced water vault battery 467173	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5153970