

**FORM
INSP**Rev
X/20

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:

04/19/2021

Submitted Date:

05/03/2021

Document Number:

693505152

FIELD INSPECTION FORM
 Loc ID 446484 Inspector Name: Silver, Randy 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:

19 Number of Comments

10 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 |
|-----------------|--------------|----------------------------------|---------------------------------|
| , | 303-825-4822 | cogcc@kpk.com | All Inspections |
| , | | dnr_cogccenforcement@state.co.us | |
| Leonard, Mike | | mike.leonard@state.co.us | |
| Brown, Kari | | kari.oakman@state.co.us | |
| Ferrin, Jeremy | | jeremy.ferrin@state.co.us | |
| Pesicka, Conor | | conor.pesicka@state.co.us | |
| Canfield, Chris | | chris.canfield@state.co.us | |
| Gomez, Jason | | jason.gomez@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|--------------|--------|-------------|------------|---------|---------------|-------------|
| 446608 | TANK BATTERY | AC | 07/15/2016 | | - | GRANT | AC |

General Comment:

LocationOverall Good: ☐

| | | | |
|----------------------|----------|-------|--|
| Signs/Marker: | | | |
| Type | WELLHEAD | | |
| Comment: | Adequate | | |
| Corrective Action: | | Date: | |

| | | | |
|---------------------------|--|--|-------------|
| Emergency Contact Number: | | | |
| Comment: | | | |
| Corrective Action: | | | Date: _____ |

| | | | |
|---------------------------|--|-------|--|
| Good Housekeeping: | | | |
| Type | DEBRIS | | |
| Comment: | Dead weeds and trash. | | |
| Corrective Action: | Complay wiith rule 606 | Date: | |
| Type | OTHER | | |
| Comment: | Mechanical Issues | | |
| 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. | Date: | |
| Type | OTHER | | |
| Comment: | Materials handling and spill prevention procedures and practices. | | |
| Corrective Action: | Comply with COGCC rule 1002 F (2) B | Date: | |
| Type | OTHER | | |
| Comment: | Operators will fence or cover open excavations to prevent access when sites are not attended | | |
| Corrective Action: | Remediation Safety fence rule 913 b 5 B | Date: | |
| Type | OTHER | | |
| Comment: | Stained soil. | | |
| Corrective Action: | Properly dispose of oily waste in accordance with 905.e | Date: | |
| Type | OTHER | | |
| Comment: | Repairs being completed in unsafe manner; or using unsuitable materials. Integrity of repairs not verified. | | |
| Corrective Action: | Repair flowlines or crude oil transfer lines to comply with rule 1102.j. | Date: | |
| Type | OTHER | | |
| Comment: | Self-inspection, maintenance and good house keeping procedures and schedules. | | |
| Corrective Action: | Comply with COGCC rule 1002 F (2) D Provide COGCC with pocedure and maintenance documentation. | Date: | |
| Type | UNUSED EQUIPMENT | | |
| Comment: | Unused equipment (pipe and equipment) | | |
| Corrective Action: | Comply with rule 606 | Date: | |

Overall Good: ☐

| | | | | |
|----------------|------|--------|--|--|
| Spills: | | | | |
| Type | Area | Volume | | |

In Containment: No

Comment:

☐ Multiple Spills and Releases?

| | | | |
|--------------------|---|-------|--|
| Fencing/: | | | |
| Type | | | |
| Comment: | Cattle panels around open excavation. No livestock in area. | | |
| Corrective Action: | | Date: | |

| | | | |
|-----------------------------------|--|-------|-----------------|
| Equipment: | | | corrective date |
| Type: Ancillary equipment | # 2 | | |
| Comment: | Electric panels. Panels are not LOTO | | |
| Corrective Action: | | Date: | |
| Type: Bird Protectors | # 3 | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type: Gas Meter Run | # 1 | | |
| Comment: | Meters will be calibrated annually unless more frequent calibration is required by contractual obligations or by the Director. | | |
| Corrective Action: | Meter Calibration rule 430 d (1) and (2) | Date: | |
| Type: Compressor | # 1 | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type: Horizontal Heated Separator | # 1 | | |
| Comment: | Is Locked out but tagged is not properly filled out. | | |
| Corrective Action: | | Date: | |
| Type: Emission Control Device | # 2 | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Tanks and Berms:

| Contents | # | Capacity | Type | Tank ID | SE GPS | |
|--------------------|---|----------|-----------|---------|--------|-------|
| CRUDE OIL | 1 | 300 BBLS | STEEL AST | | , | |
| Comment: | Tank has been removed from Secondary containment area due to spill remediation project. | | | | | |
| Corrective Action: | | | | | | Date: |

Paint

| | | |
|------------------|----------|--|
| Condition | Adequate | |
| Other (Content) | | |
| Other (Capacity) | | |
| Other (Type) | | |

Berms

| | | | | |
|--------------------|--|---------------------|---------------------|-------------|
| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
| | | | | |
| Comment: | | | | |
| Corrective Action: | | | | Date: |
| Contents | # | Capacity | Type | Tank ID |
| PRODUCED WATER | 1 | OTHER | FIBERGLASS AST | |
| Comment: | Produced water tank has been removed and is placed on site due to spill remediation project. | | | |
| Corrective Action: | | | | Date: |

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 |
| PRODUCED WATER | 1 | OTHER | CONCRETE SUMP/VAULT | |
| Comment: | | | | |
| Corrective Action: | | | | Date: |

Paint

| | |
|------------------|----------|
| Condition | Adequate |
| Other (Content) | |
| Other (Capacity) | 30bbl |
| Other (Type) | |

Berms

| | | | | |
|--------------------|----------|---------------------|---------------------|-------------|
| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
| Earth | Adequate | Walls Sufficent | Base Sufficent | Adequate |
| Comment: | | | | |
| Corrective Action: | | | | Date: |

Wells Served By Facilities AboveAirsID

| |
|------------|
| API Number |
| 123-09309 |

| | |
|------------|--------|
| API Number | AirsID |
|------------|--------|

Venting:

| | | | |
|----------|----|--|--|
| Yes/No | NO | | |
| Comment: | | | |

| | | | |
|--------------------|--|-------|--|
| Corrective Action: | | Date: | |
| Flaring: | | | |
| Type | | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Inspected FacilitiesFacility ID: 446608 Type: TANK API Number: - Status: AC Insp. Status: AC**Idle Well**Purpose: ☒ Shut In ☐ Temporarily AbandonedReminder: EQUIPMENT ONSITEComment: This location has been issued Rule 901. a. Suspension of operations by COGCC.Corrective Action: Date:

Reclamation - Storm Water - Pit**Storm Water:**

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Other | Fail | | | | | |
| | | Tracking Pad | Fail | | | |

Comment: Tracking pad not installed or installed improperly or not adequately maintained to prevent track of material offsite. No BMP's on site to stop the impact to public health, safety, welfare, the environment and wildlife resources.

Corrective Action: Maintain vehicle tracking BMPs on the oil and gas location to comply with rule 1002.f.(2)F. Comply with rule 1002 f.

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

| Comment | User | Date |
|--|---------|------------|
| <p>COGCC Inspection Report Summary</p> <p>On Monday April 19 2021 at approximately 11:00 AM, I, Inspector Randy Silver, conducted an on-site inspection.</p> <p>Location: Grant Tank BTRY</p> <p>Operator: KP Kauffman</p> <p>Loc ID # 445484</p> <p>County: Weld</p> <p>While there, I observed a production facility with an open remediation project. During this inspection the following possible compliance issues were observed:</p> <p>Storm water: Rule 1002 f See Photo's 3, 4, 1,6,7,8,9,23,24.</p> <p>Debris: Rule 606 See photo 6.</p> <p>Unused equipment: Rule 606 See photos 10, 11.</p> <p>Meter calibration: Rule 430 d (1) and (2).</p> <p>Tracking Pad: Rule 1002 f (2) F See photos 2,5,34.</p> <p>Remediation safety fence: Rule 913 b 5 B See photos 8, 12, 13,18,21,36.</p> <p>Mechanical Issue: Rule 608 e See Photos 37, 38, 39.</p> <p>Self-inspection: Rule 1002 F (2) B.</p> <p>Material handling: Rule 1002 F (2) D.</p> <p>Flow line repairs: Rule 1102 j</p> <p>After an internal review of recent inspections at KPK facilities, COGCC Staff has determined that KPK has repeatedly and consistently failed to comply with certain COGCC rules (categorized in those inspection reports as violations related to impacting or threatening to impact public health, safety, welfare, the environment and wildlife resources). In light of this apparent pattern of violations, violation(s) identified in this inspection report under those categories are being entered for notification and documentation only and are not intended to provide KPK the potential opportunity to resolve the alleged violation(s) without the imposition of penalty, pursuant to Rule 522.c. Therefore, in this inspection report, COGCC Staff has documented violation(s) and identified relevant corrective action (s) required to return to compliance, and pursuant to Rule 522.c., retains discretion to seek penalties for any violation documented in this inspection report.</p> <p>This production facility spill remediation project # 12158 was initiated due to a complaint Doc#200446391 with inspection by Kari Brown Doc# 689500871 on 11-7-18. This project has been ongoing for over two years. Last form submitted was remediation work plan Doc#402640251 on 3-25-21. This project is in close proximity to elementary school and public sidewalk used by elementary kids to go home. Work site is approx... 100ft from said sidewalk. Inspector requested Drone flight of facility, approved by supervisor Jason Gomez and is attached to inspection. Drone data and video can be provided upon request. No BMP's were installed prior to construction no are any BMP's in place at time of inspection to protect the impact to public health, safety, welfare, the environment and wildlife resources.</p> <p>Weather conditions: Cloudy and raining.</p> <p>A follow up on this site inspection needs to be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.</p> <p>This is a summary of inspection report.</p> | silverr | 05/03/2021 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|----------------------|---|
| 402678523 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5419559 |
| 693505153 | loc pic | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5419556 |
| 693505154 | Drone Data | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5419557 |