

**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:

12/08/2021

Submitted Date:

12/10/2021

Document Number:

697601746

**FIELD INSPECTION FORM**Loc 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:**

10 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             |
|------------------|--------------|---------------------------------|---------------------|
| LLC, Marcom      | 208-201-8280 | PrimaryContractor@marcomllc.net |                     |
| Inspections, KPK |              | cogcc@kpk.com                   | All KPK Inspections |

**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          |
| 476532      | SPILL OR RELEASE | CL     | 10/27/2020  |            | -       | HORST-SCHUTT PW Storage Vessel | EI          |

**General Comment:**

remediation project 14115 ongoing at site with respect to spill 476532. No Operator or contractor staff at location during inspection.

Battery 467173 has been deconstructed by removal of steel above ground storage tanks and also by removal of separator and emission control device as noted in Inspection 697601630..

Director has determined that a substantive change to the location has occurred and that a site investigation and remediation plan must be put in place to document the substantive changes to the location under rule 911.1.(4).

Open excavation is approximately 47 x 66 x 14 feet (L W D) and was fenced adequately at time of inspection.

**Location**Overall Good: ☒**Signs/Marker:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Type               | BATTERY  |       |  |
| Comment:           | battery sign present but no production equipment or storage vessels left on location |       |  |
| Corrective Action: |  | Date: |  |

Emergency Contact Number:

|                    |                 |       |  |
|--------------------|-----------------|-------|--|
| Comment:           | on battery sign | Date: |  |
| Corrective Action: |                 |       |  |

Overall Good: ☐**Spills:**

|      |      |        |  |  |
|------|------|--------|--|--|
| Type | Area | Volume |  |  |
|------|------|--------|--|--|

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

|                                   |  |       |                  |
|-----------------------------------|--|-------|------------------|
| Type: Emission Control Device     | # 0  |       | corrective date  |
| Comment:                          | removed  |       |                  |
| Corrective Action:                |  | Date: |                  |
| Type: Horizontal Heated Separator | # 0  |       |                  |
| Comment:                          | photos attached to inspection 697601630 show removal of separator  |       |                  |
| Corrective Action:                | per 911a(4) director requires a form 27 site investigation and remediation plan for this site as substantive changes have been made to site.<br>corrective action date as in previous inspection 697601630 |       | Date: 10/25/2021 |

**Tanks and Berms:**

|                    |  |           |           |         |        |                  |
|--------------------|--|-----------|-----------|---------|--------|------------------|
| Contents           | #  | Capacity  | Type      | Tank ID | SE GPS |                  |
| CRUDE OIL          | 0  | <100 BBLS | STEEL AST |         | ,      |                  |
| Comment:           | photos attached to inspection 697601630 show removal of crude tanks as does photo attached to this inspection  |           |           |         |        |                  |
| Corrective Action: | per 911a(4) director requires a form 27 site investigation and remediation plan for this site as substantive changes have been made to site.<br>corrective action date as in previous inspection (697601630) |           |           |         |        | Date: 10/25/2021 |

**Paint**

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

**Berms**

|          |                  |                     |                     |             |
|----------|------------------|---------------------|---------------------|-------------|
| Type     | Capacity         | Permeability (Wall) | Permeability (Base) | Maintenance |
|          |                  |                     |                     |             |
| Comment: | no berms at site |                     |                     |             |

|   |   |          |      |         |        |  |
|---|---|----------|------|---------|--------|--|
| Corrective Action:                        |   |          |      |         | Date:  |  |
| Contents                                  | # | Capacity | Type | Tank ID | SE GPS |  |
| PRODUCED WATER                            | 0 |          |      |         | ,      |  |
| Comment: removed as part of project 14115 |   |          |      |         |        |  |
| Corrective Action:                        |   |          |      |         | Date:  |  |

**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:         | 467173 | Type: | TANK     | API Number: - | Status: | AC | Insp. Status: | EI |
| Facility ID:         | 476532 | Type: | SPILL OR | API Number: - | Status: | CL | Insp. Status: | EI |

**Environmental****Spill/Remediation:**

Comment: last approved update to remediation project was received on 08/17/2021.

Groundwater sampling and analysis of the monitoring wells/piezometers installed in August 2021 must include analysis of Table 915-1 organic compounds in groundwater and Table 915-1 groundwater inorganic parameters (as spill of produced water is being remediated).

Groundwater sampling and analysis must include analysis of the following PAHs which were present at or above protection of groundwater soil screening level concentrations: naphthalene (regulation 41 threshold 140ug/l)  
1-methylnaphthalene,  
2-methylnaphthalene,  
and  
benzo(a)anthracene (regulation 41 threshold 0.16ug/l)  
Rule 915.d guidance to demonstrate that concentrations of the four PAHs present in soils are not present in groundwater above thresholds

Corrective Action: corrective action date is 90 days following last approved submittal.

Next submittal must include results of all analytical data from soils borings and groundwater samples collected at the site that have not previously been reported.

Provide documentation of sampling and analysis event indicated as occurring in or after August 2021 at location. Documentation as attachments must include map of all sample locations to date, laboratory reports of all analytical results (PDFs) that have not previously been reported and summary table(s) with all analytical data to date.  
The summary tables must present all analytical data to date in comparison to Table 915-1 thresholds.

Date: 11/17/2021

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

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

| Document Num | Description   | URL   |
|--------------|---|---|
| 697601747    | fenced excavation                                   | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5604041">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5604041</a> |
| 697601748    | foreground is area with now removed storage vessels | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5604042">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5604042</a> |