

**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:

03/31/2022

Submitted Date:

03/31/2022

Document Number:

702700075

**FIELD INSPECTION FORM**
 Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
 \_\_\_\_\_ Anderson, Laurel \_\_\_\_\_ 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:**

12 Number of Comments

7 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
KPK		cogcc@kpk.com	All Inspections
MacLaren, Joe		joe.maclaren@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Axelson, John		john.axelson@state.co.us	
Marcom		primarycontractor@marcomllc.net	KPK Primary Contractor
Rickard, Jeff		JRickard@kpk.com	KPK environmental
Gorka, Ray		RGorka@kpk.com	KPK environmental
Ferrin, Jeremy		jeremy.ferrin@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478843	Flowline System	AC	12/17/2020		-	Facility 9	EI

**General Comment:**

This is an environmental inspection of an off-location flowline spill (Facility 9 / Vincent AS - Spill/Release Point ID 481871) that was reported to have daylighted to the surface. COGCC representatives arrived onsite to perform Environmental Inspections of the flowline spill on March 30th and 31st, 2022. While onsite the inspectors observed initial spill response activities. KP Kauffman has begun excavation activities and exposed a portion of the flowline, stockpiling excavated soil and oily waste nearby. Excavation activities are ongoing.

The Inspectors noted stained soil on Weld CR 21 and within the Weld CR 21 right of way. Stained soil could be observed along CR 21 both north and south of the current excavation. Stained soils along the west side of CR 21 extend approximately 684 feet north and approximately 256 feet south of the initial excavation.

The initial excavation measures approximately 19' x 9' x 5' (LWD). Soil is being stockpiled south of the initial excavation with no liner or other BMPs. Fencing around the initial excavation is inadequate - Fencing does not surround the entire excavation and is elevated approximately 1' above ground level in some places. The secondary excavation is open and not fenced in. Trash was observed north of the initial excavation.

Operator shall address all COAs listed on Form 19i (Doc 402996366) and this Inspection and Response Form, and submit a Supplemental Form 19 within 10 days of discovery of this release (Due 4/7/2022).



**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	TRASH		
Comment:	Trash onsite.		
Corrective Action:	Comply with Rule 606.	Date:	04/07/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Fencing/:**

Type	OTHER		
Comment:	Orange construction fencing around initial excavation is not installed properly in order to provide adequate protection of public safety (does not surround entire perimeter of excavation nor effectively prevent access to the excavation when unattended).  Second excavation does not have fencing installed.		
Corrective Action:	Operators will fence or cover open excavations to prevent access when sites are not attended per Rule 913.b.(5)B.i.	Date:	03/31/2022

**Equipment:**

Type: Flow Line	#		corrective date
Comment:	Repair all active flowlines intended for return to service to comply with Rule 1102.j.; or Historically abandoned/out of service flowlines exposed in the excavation must be abandoned per Rule 1105 (ends sealed per 1105.e.4).		
Corrective Action:	Repair flowlines or crude oil transfer lines to comply with Rule 1102.j. Historically abandoned/out of service flowlines exposed in the excavation must be abandoned per Rule 1105 (ends sealed per 1105.e.4).  Provide confirmation documentation of completion (photos) to COGCC Integrity Inspector and Engineer.		Date: 03/29/2022

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	



**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_

Estimated Spill Volume: \_\_\_\_\_

Comment: Initial spill response excavation activities are ongoing. Two excavations have been initiated. The initial excavation is approximately 19' x 9' x 5' (LWD); Flowlines are exposed within the excavation. Another smaller excavation has been started north of the initial excavation. No groundwater was observed in either excavation. Stained soil was observed on CR 21 and along the CR 21 right of way. Stained soil/impacts remain in place along the west side of CR 21.

Corrective Action: **Comply with COAs on Form 19 (Doc 402996366).**

Date: 04/07/2022

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)
Oily Soil	Piles	Inadequate		
Comment		Oily waste is stockpiled on location with no BMP's present.		
Corrective Action		Manage stockpiles in compliance with Rule 1002.(c). Manage waste in compliance with Rule 913.b.(3) and COGCC Guidance 913.b.(5)B.i-v. Properly dispose of oily waste in accordance with 905.e. and document removal of oily waste on Supplemental Form 19.		Date: 04/09/2022
Oily Soil	Other	Inadequate		
Comment		Stained soils were observed on Weld CR 21 and within the Weld CR 21 right of way.		
Corrective Action		Immediately notify Weld county and clean up impacts within public road and right of way. Properly dispose of oily waste in accordance with 905.e. and document removal of oily waste on Supplemental Form 19.		Date:

**Spill/Remediation:**

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

Corrective Action: \_\_\_\_\_

Date: \_\_\_\_\_

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

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

Pilot: \_\_\_\_\_

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

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

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: No BMPs in place to control stormwater runoff.

Corrective Action: Install BMPs in accordance with 1002.f.(2) to prevent runoff and completely contain impacts along CR 21.

Date: 04/15/2022

**Pits:** ☐ NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
702700076	Site Diagram	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711288">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711288</a>
702700077	Inadequate Fencing	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711289">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711289</a>
702700078	Excavation of Stained Soils	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711290">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711290</a>
702700079	Excavation of Stained Soils	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711291">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711291</a>
702700080	Exposed Flowlines	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711292">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711292</a>
702700081	Exposed Stained Soil after Excavator Scrape	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711293">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711293</a>
702700082	Inadquate Fencing Around Flowline Excavation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711294">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711294</a>
702700083	Unfenced Open Excavation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711295">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711295</a>
702700084	Open Excavation along CR 21 (no fencing)	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711296">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711296</a>
702700085	Overview Facing North	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711297">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711297</a>
702700086	Stained Soil along CR 21 & Utility Locates	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711298">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711298</a>
702700087	Stained Soil along CR 21 South of Excavation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711299">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711299</a>
702700088	Stained Soil Along West Side of CR 21	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711300">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711300</a>
702700089	Stained Soil Along West Side of CR 21	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711301">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711301</a>
702700090	Stained Soil on CR 21 Between Excavations	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711302">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711302</a>
702700091	Stained Soil West of CR 21	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711303">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711303</a>
702700092	Stained Soil West of CR 21	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711304">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711304</a>
702700093	Stocked Piled Excavated Soil/Oily Waste (No Liner or BMPs)	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711305">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711305</a>
702700095	Stained Soil North of Initial Excavation Along Flowline	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711306">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711306</a>
702700096	Trash	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711307">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711307</a>

702700097	Stained Soil West of CR 21	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711308">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711308</a>
702700099	Stained Soil Approximately 380 Ft North of Excavation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711309">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5711309</a>