

**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:

03/22/2022

Submitted Date:

03/23/2022

Document Number:

689501343**FIELD INSPECTION FORM**Loc ID 318931 Inspector Name: Graber, Candice (Nikki) On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1675 BROADWAY, STE 2800City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:7 Number of Comments2 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
Axelson, John		john.axelson@state.co.us	
Rickard, Jeff		JRickard@kpk.com	KPK environmental
LLC, Marcom		PrimaryContractor@marcomllc.net	
, KPK		cogcc@kpk.com	All Inspections
Gorka, Ray		RGorka@kpk.com	KPK environmental

General Comment:

This is an environmental inspection of an unreported spill originally documented by COGCC inspectors on 3/21/2022 (photos 9 & 10). At the time of inspection crews were on site to remove surficial soil impacts.

Any corrective actions from previous inspections that have not been addressed are still applicable.

Photos attached to document site conditions.

Environmental**Spills/Releases:**

Type of Spill: OIL

Estimated Spill Volume: _____

Comment:

The spill appears to have occurred from the east side of the crude oil tank in unlined earthen containment (photos 3&4). COGCC inspectors first observed the active spill on 3/21/2022; at the time of the inspection KPK crews were mitigating the release by sucking up the fluids which were leaking from the base of the crude tank at approximately 2-3 gallons per minute. During the 3/22/2022 inspection, impacted soil from the spill could be observed from the northeast side of the crude oil tank around to the south side of the produced water tank and in between tanks (photos 2-6). On November 23, 2021 COGCC inspection Document #699304532 indicated staining at the base of the tank in the general area of the release (photo 11). At the time of inspection (~11:00 am) crews were removing impacted soils from around the tanks with shovels and placing it into a loader (photo 7). The soil was then loaded onto a flatbed truck on location (photo 8). When COGCC inspectors returned to location at ~2:30pm the excavated areas had been backfilled with clean soil. As per conversations with crew, soil samples may have been collected prior to backfill.

Corrective Action:

Submit an Initial Form 19 Spill/Release report to document spill clean-up. Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to any additional sampling events performed on location.

Date: 03/24/2022

Reportable: _____

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____

Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Waste Management:

Type Management Condition GPS (Lat) (Long)

Oily Soil

Comment

Impacted soil was observed on a flatbed truck to be moved off location. The truck then traveled to KPK yard before returning empty to the spill location.

Corrective Action

Provide disposal manifests and gate tickets for all soil removed from location.

Date: 04/05/2022

Spill/Remediation:

Comment:

Corrective Action:

Date: _____

Emission Control Burner (ECB): _____

Comment:

Pilot: _____

Wildlife Protection Devices (fired vessels): _____

COGCC Comments

Comment

As per conversation with KPK crew the leaking crude oil tank is to be removed and replaced. The removal of an above ground storage tank will require the submission of a Form 27 Site Investigation and Remediation Workplan per Rule 911. For any new and significantly modified crude oil storage tanks Operator will construct, and maintain secondary containment devices that meet the requirements specified in Rule 603.o.

User

Date

graberc

03/23/2022

Attached Documents

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

Document Num	Description	URL
402993564	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5702564
689501344	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5702563