

FORM  
INSPRev  
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:

12/28/2022

Submitted Date:

01/04/2023

Document Number:

696105668

### FIELD INSPECTION FORM

Loc ID: 450344      Inspector Name: Edwardson, Dylan      On-Site Inspection:       2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 46290  
Name of Operator: KP KAUFFMAN COMPANY INC  
Address: 1700 LINCOLN ST STE 4550  
City: DENVER      State: CO      Zip: 80203

**Status Summary:**

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

**Findings:**

- 12 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
Graber, Nikki		nikki.graber@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
,		cogcc@kpk.com	All Inspections

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
102702	PIT	AC			-	BOXER LEASE East Skim Pit	RI
102703	PIT	AC			-	BOXER LEASE WEST SKIM PIT	RI
102705	PIT	AC			-	BOXER Unit Historical PW Pit	RI
313791	LOCATION	AC			-	BOXER UNIT-62N58W 32SEW	RI
313841	LOCATION	AC			-	BOXER UNIT-62N58W 32NESW	RI
313843	LOCATION	AC			-	BOXER UNIT-62N58W 32NWNE	RI
439100	TANK BATTERY	AC	09/26/2014		-	Boxer 25,26,29 Battery	RI
450344	LOCATION	AC			-	Boxer 25,26,29 Battery	RI

**General Comment:**

This is an Interim Reclamation and Stormwater Inspection for multiple locations (313791, 313841, 313843, and 450344) that are located on a single location.

**Location**

Overall Good:

**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:	Signs not legible at tank battery; NFPA stickers faded/torn on tank battery (Facility ID 493100). Sign/emergency contact information missing at heater treater, north end of location. Refer to attached inspection photos.		
Corrective Action:	Install sign to comply with Rule 605.g.	Date:	02/04/2023

**Emergency Contact Number:**

Comment:	No emergency contact information/number observed on the produced water tank east of produced water pit (Facility ID 102701). Refer to attached inspection photos.		
Corrective Action:	Install sign to comply with Rule 605.a.	Date:	02/04/2023

**Good Housekeeping:**

Type	WEEDS		
Comment:	Undesirable vegetation (e.g. russian thistle and kochia) was observed throughout the location and has spread off location. Refer to attached inspection photos for further information.		
Corrective Action:	Comply with Rule 606.	Date:	01/11/2023
Type	DEBRIS		
Comment:	Debris observed throughout location (e.g. plastic liner near produced water tank, degraded straw wattles and trash throughout). Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606.	Date:	01/11/2023

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	300 BBLs	OTHER		,
Comment:	Tank battery rusted near bottom (Facility ID 493100). Refer to attached inspection photo.				
Corrective Action:	Inspect, maintain and repair tanks to comply with Rule 609.b				Date: 02/04/2023

**Paint**

Condition	<input type="text"/>
Other (Content)	<input type="text"/>
Other (Capacity)	<input type="text"/>
Other (Type)	<input type="text"/>

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate			Inadequate

Comment:	Breached berm around produced water tank, east of produced water pit. It does not appear there is adequate free-board and material is unconsolidated. Refer to attached inspection photos.	
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 912.d. (1).	Date: 01/18/2023

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 102702 Type: PIT API Number: - Status: AC Insp. Status: RI

Facility ID: 102703 Type: PIT API Number: - Status: AC Insp. Status: RI

Facility ID: 102705 Type: PIT API Number: - Status: AC Insp. Status: RI

Facility ID: 313791 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 313841 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 313843 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 439100 Type: TANK API Number: - Status: AC Insp. Status: RI

Facility ID: 450344 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Remediation Project #9363 is still active and open. Spill/Release Report (Form 19 I) (Doc #403208400) was submitted by the Operator which included analytical data (Doc #403208469) from the soil samples containing elevated SAR and EC throughout the pit closure area. The soil samples remain elevated and are now subject to Table 915-1 Soil Suitability for Reclamation standards. As per COA from the Form 19i (Doc #403208400) Operator is to submit an updated Form 27 for remediation of the pit.

Corrective Action: Operator shall submit a Supplemental Form 27 for remediation of the historic spill and impacted soil. This Form 27 shall also include a Reclamation Plan per 915.b (see Operator Guidance document).

Date: 02/06/2023

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: \_\_\_\_\_

**Spill/Remediation:**

Comment: Remediation Project #9362 is still active and open. It does not appear the Operator has fully delineated the entire (e.g. vertical and horizontal) extent of the salt kill area. Operator submitted Form 27(S) (Doc #401616824) with attachments, that illustrates only a portion of the salt kill area was sampled, which does not provide sample depth data to determine vertical extent of the spill. Analytical data via attachment (Doc #401617034) suggests that the sampled areas have elevated SAR in exceedance of Table 915-1 standards. As this remediation project is still active and open, the salt kill area is now subject to Table 915-1 Soil Suitability for Reclamation standards. Refer to the attached inspection photos for salt kill area figure.

Corrective Action: Operator shall delineate the entire vertical and horizontal extent of the impacted salt kill areas with an updated soil sample map and sampling plan for review by area Environmental Protection Specialist and Reclamation Specialist via the Supplemental Form 27, including a Reclamation Plan per 915.b (see Operator Guidance document).

Date: 02/06/2023

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:** This location does not comply with Rule 1002.f. Sediment laden stormwater has discharged off location along the southern perimeter of the location with gully erosion evident. Stormwater BMPs (e.g. straw wattles) are inadequate as they are degraded and not properly installed per good engineering practices, allowing continued sediment transport and degradation to adjacent lands. Additionally, the produced water pit on the southwest portion of the location doesn't appear stabilized as rill erosion and unconsolidated material were observed on pit walls. Refer to attached inspection photos.

**Corrective Action:** Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices.  
  
The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.

Date: 12/28/2022

**Pits:**  NO SURFACE INDICATION OF PIT

Type: <u>Skimming/Settling</u>	Lined:	Pit ID:	Lat:	Long:
Reference Point: _____	Other: _____	Length: _____	Width: _____	

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

**Comment:** The Boxer West Skim Pit (#102703) and the Boxer East Skim Pit (#102702) are still shown as active/open on COGCC database and need proper documentation for closure. This was required in previous FIR (doc #681700992 and #681701025) and no documentation has been provided to staff at the time of this inspection.

A bare spot approximately 10' x30' was also observed near the Boxer East Skim Pit that will require further investigation of soil properties as there was no vegetation observed during this inspection, possibly a result of salt contaminated soils. Refer to attached inspection photos.

**Corrective Action:** Provide pit closure, remediation, and reclamation documentation via supplemental Form 27 for each open pit/skim pit.  
  
Corrective action date is being back-dated to previous FIR CA dates (reference Doc #681700992 and #681701025).

Date: 04/21/2018

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

**Comment:** \_\_\_\_\_  
**Corrective Action:** \_\_\_\_\_

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

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

**Comment:** \_\_\_\_\_  
**Corrective Action:** \_\_\_\_\_

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

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: \_\_\_\_\_ 2+ feet Freeboard: \_\_\_\_\_

**Comment:** \_\_\_\_\_  
**Corrective Action:** \_\_\_\_\_

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

**Attached Documents**

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

Document Num	Description	URL
403280336	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5970427">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5970427</a>
696105671	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5970426">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5970426</a>