

**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:

12/28/2022

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: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1700 LINCOLN ST STE 4550City: 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 Comments10 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.

LocationOverall 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		
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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		
Other (Content)		
Other (Capacity)		
Other (Type)		

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:	<u>102702</u>	Type:	<u>PIT</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>102703</u>	Type:	<u>PIT</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>102705</u>	Type:	<u>PIT</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>313791</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>313841</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>313843</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>439100</u>	Type:	<u>TANK</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>450344</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

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:

Lat _____

Long _____

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

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 PITType: Skimming/Settling 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5970427
696105671	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5970426