

**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:

07/10/2023

Submitted Date:

07/11/2023

Document Number:

697602135

FIELD INSPECTION FORM

Loc ID 318931 Inspector Name: Ahmadian, Alexander 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:

- 15 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	
Brown, Kari		kari.oakman@state.co.us	
, KPK		cogcc@kpk.com	All Inspections
Anderson, Laurel		laurel.anderson@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
470886	TANK BATTERY	AC	01/15/2020		-	UPRR 42 Pan Am D 2 battery	EI

General Comment:

COGCC environmental inspection to determine progress on Spill ID 481819. This is an environmental inspection. Photos attached to document site conditions.

Any corrective actions from previous inspections or conditions of approval from previous forms that have not been addressed are still applicable.

Current site status: Above ground storage tank has been removed from location, stained soil was left in place surrounding the former tank, fencing around the tank battery has been taken down and is scattered throughout the location, various equipment is not properly stored on location, overall site conditions are very poor.

Location

Overall Good:

Emergency Contact Number:

Comment: No signage at the separator or the above ground storage tanks.

Corrective Action: Install sign to comply with Rule 605.e.

Date: 08/10/2023

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds overgrown throughout the location		
Corrective Action:	Comply with Rule 606.	Date:	<u>07/18/2023</u>
Type			
Comment:	Overall housekeeping is very poor.		
Corrective Action:		Date:	
Type	UNUSED EQUIPMENT		
Comment:	Equipment related to the former tank was left on the location. This includes piping connected to the tanks, stairs leading to the tanks that were on its side in the middle of the location pad, and barbed wire fencing surrounding the former tank.		
Corrective Action:	Comply with Rule 606.	Date:	<u>07/26/2023</u>

Overall Good:

Spills:

Type	Area	Volume	
Crude Oil	Tank	<= 1 bbl	
Comment:	Spill on east side of the former crude tank appears mixed with water.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a. Remove free fluids and contact COGCC EPS staff per Rule 912.b.		Date: <u>07/12/2023</u>

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type	LOCATION		
Comment:	Barbed wire fencing around the tanks have been unstaked and are scattered throughout the location.		
Corrective Action:	Per Rule 603.h, Oil and Gas Facilities will be adequately fenced to restrict access by unauthorized persons.		Date: <u>07/21/2023</u>

Equipment:

Type: Flow Line	#		corrective date
Comment:	Flowlines or crude oil transfer lines not maintained to prevent failures or leakage connected to the former tank. Integrity issues not corrected. Valves not locked and tagged out.		
Corrective Action:	Maintain active and inactive flowlines and crude oil transfer lines to meet rule 1102.i.		Date: <u>07/12/2023</u>

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL					

Comment:	Flowline or transfer line has been left in place but is not connected to the west above ground storage tank. The storage tank has not been removed or abandoned at this location.	
Corrective Action:	Per Rule 1105.b, Upon removing a flowline or crude oil transfer line from use with the intent to abandon, an operator must immediately apply OOSLAT to the risers. OOSLAT must stay in place at all times during the process of abandoning the flowline or crude oil transfer line until the operator removes the riser.	Date: 07/12/2023

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:	Earthen berm where tanks are located has been damaged and is no longer adequate.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 912.d.(1).			Date: 07/31/2023

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities

Facility ID: 470886 Type: TANK API Number: - Status: AC Insp. Status: EI

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Tanks	Inadequate		
Comment	Stockpiled soil to the west of the tank is out of containment, inadequately bermed, has no liner, and no signage present to indicate if the soil is contaminated.			
Corrective Action	Properly dispose of oily waste in accordance with 905.e.			Date: 07/13/2023

Spill/Remediation:

Comment:	High volumes of staining are visible where the former tank was removed.		
Corrective Action:	In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.		Date: 07/12/2023

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

COGCC Comments

Comment	User	Date
Overall site conditions are very poor. The former tank was removed, however the operator has performed no remediation at the site. A follow up site inspection is needed to ensure that the addressed compliance issues comply with CECMC rules.	ahmadiia	07/11/2023

Attached Documents

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

Document Num	Description	URL
403460730	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6177040
697602136	Photolog	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6177032