

**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:

08/07/2023

Submitted Date:

08/12/2023

Document Number:

710100050

FIELD INSPECTION FORMLoc 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: 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

8 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	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Silver, Randy		randy.silver@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	All inspections
KPK		cogcc@kpk.com	All Inspections
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Robinson, Taylor		taylor.robinson@state.co.us	
Romero, David		romero.david@epa.gov	Federal On-Scene Coordinator
MacLaren, Joe		joe.maclaren@state.co.us	
Bizyayev, Valeriy		bizyayev.valeriy@epa.gov	Federal On-Scene Coordinator
Young, Heather		heather.young@state.co.us	Field Services Section Manager

General Comment:

Operator (KP Kauffman - KPK) & Subcontractor Personnel were on location at the time of this Environmental inspection.

At approximately 14:00 on Monday August 7, 2023, ECMC Environmental Protection Specialist (EPS), Laurel Anderson, joined ECMC Compliance Specialist, Robbie Revas, and Integrity Inspector, Joe MacLaren, on location to perform an environmental inspection and oversee initial spill response activities in response to a third party strike of a KP Kauffman multiphase flowline resulting in the release in an unknown volume of oil, produced water and gas. The line was struck during excavation activities while installing a perimeter trench on location.

Initial spill response activities included the installation of an earthen dam within the trench approximately 600' north of the source area to stop the flow of oil and produced water down the trench. Hydrovac crews were mobilized to the spill to skim free product and liquids (produced water and water infiltrating the trench from the adjacent Creek.) from the surface of the trench. The break in the line was not visible at the time of inspection. KP personnel reportedly isolated the line prior to EPS arrival. Fluids removed from the trench were transported to a frac tank staged elsewhere on the property.

Robbie Revas (ECMC) indicated upon his arrival free product extended the entire length and width of the trench up to the earthen dam (~575' long by ~7' wide). Removal efforts by roughly 14:45 had successfully reduced the extent of free product by ~300' exposing ~3' of water beneath.

Additional crews later arrived on location with absorbent booms. Booms were installed at a routine interval along the length of the trench from the source area down to the earthen dam. Water was observed seeping into the trench from the western wall of the trench which parallels the creek <10' away.

ECMC personnel observed soil being bagged by Operator personnel and requested water samples be collected from the water within the trench on both sides of the earthen dam and from the adjacent creek. ECMC personnel discussed the need to notify CDPHE and after seeing the extent of the spill recommended Operatory notify the EPA.

The spill extent is located:

- In Weld County on a parcel owned by City of Thornton
- Adjacent to cropland
- Within a USFWS National Wetlands Inventory buffer for a Freshwater Emergent wetland.
- <10' east of surface water (Big Dry Creek)
- Within 100-year floodplain
- Within 1/4 mile of a(n): occupied structure, livestock, ½ mile buffer for active bald eagle nest, additional surface water, riverine wetland, CR 18, and agricultural land.

KP Kauffman submitted a Form 19 Initial Spill/Release Report (Doc #403489277) on August 8th, 2023 for the spill. The spill (Facility 9 Section 1415 Corp Unit C) was assigned Spill ID #484896 and is tied to Flowline Facility ID #478843.

Any corrective actions/conditions of approval from previous inspections/forms that have not been addressed remain applicable. Photos are attached to document site conditions at the time of the inspections.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good: ☐**Spills:**

Type

Area

Volume

PW/CO

Comment: Gross free product and hydrocarbon sheen were observed on surface water within the trench ~8' east of the creek. Water from the creek is continuously seeping into the trench through the western wall. Hydrocarbon mist and stained soils remain in-situ at the time of inspection.

Corrective Action: Operator shall control and contain spills/releases and clean up per Rule 912.a.

Date: 08/07/2023

In Containment: No

Comment:

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

Type OTHER

Comment: Operators will fence or cover open trench/excavation to prevent access when sites are not attended Remediation Safety fence Rule 913.b.(5)B.

Corrective Action: Remediation Safety fence Rule 913.b.(5)B.

Date: 08/12/2023**Equipment:**

corrective date

Type: Flow Line

1

Comment: A 3" steel off-location multiphase flowline was struck by a third party contractor. The flowline has reportedly been isolated at the time of this inspection; however, the flowline cannot be accessed due to water infiltrating the trench where the flowline was struck.

Corrective Action: Operator will ensure the flowline is isolated and depressurized; wells and isolation valves are SI/OOSLAT to prevent an unintentional release. Operator shall provide information/documentation of any utility locate requests/markings of the flowline prior to the date of the spill. Operator shall provide a copy of the latest flowline pressure testing data and chart, as well as, provide a map (and GPS coordinates) depicting location of the valves used to isolate the flowline by means of a Form 19 Supplemental Report, or if the spill report has been closed, by means of a Supplemental Form 27.

Date: 08/19/2023**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: An off-location multiphase flowline was struck by a third party contractor during excavation of a perimeter trench resulting in the release of an unknown volume of gas, oil and produced water along within the trench. The trench is located within a freshwater emergent wetland and <10' from surface water. Impacts to water and soil have been observed ~575' north of the spill point.

Corrective Action: Remediation shall be in compliance with all applicable federal and state regulations including but not limited Sections 401 and 404 of the Clean Water Act. Operator shall notify the U.S. Army Corps of Engineers Denver Regulatory Office of the initial emergency response actions including any excavation or dredging in the wetland associated with the creek. Operator will request the U.S. Army Corps of Engineers Denver Regulatory Office to determine if a Section 404 permit will be required both for further initial emergency response and subsequent remediation activities and provide all correspondence on the subsequent Supplemental Form 19.

Date: 08/12/2023

Reportable: YES 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	Other			
Comment	Stained soil from spill remains in-situ.			
Corrective Action	Properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts to the next Supplemental Form 19 per Rule 905.b.(3).			Date: _____
Comment	Oil absorbent booms were being installed at the time of inspection.			
Corrective Action	Operator shall install booms properly to completely cover the surface of the stream, booms should be replaced when saturated to prevent desorption.			Date: 08/13/2023

Spill/Remediation:

Comment: Gross free product, hydrocarbon sheen, hydrocarbon mist, and stained soils remain in-situ at the time of inspection.

Corrective Action: Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director. Form 19 Supplemental is due by November 5, 2023.

Date: 11/05/2023

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: [Inadequate BMPs in place to control stormwater runoff and runoff into the spill footprint.](#)

Corrective Action: [Install and maintain BMPs in accordance with 1002.f.\(2\) to prevent runoff and runoff and completely contain impacts the spill footprint to minimize contact with stormwater and precipitation.](#)

Date: 08/12/2023

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
403494879	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6216608
710100052	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6216607