

**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:

08/08/2023

Submitted Date:

08/22/2023

Document Number:

710100053

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:

14 Number of Comments

6 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	
Robinson, Taylor		taylor.robinson@state.co.us	
KP Kauffman		COGCC@KPK.com	All Inspections
MacLaren, Joe		joe.maclaren@state.co.us	
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Young, Heather		heather.young@state.co.us	CDPHE WQCD Field Services Manager
Romero, David		romero.david@epa.gov	EPA Emergency Response On-Scene Coordinator
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Silver, Randy		randy.silver@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Bizyayev, Valeriy		bizyayev.valeriy@epa.gov	EPA Emergency Response On-Scene Coordinator

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
484896	SPILL OR RELEASE	AC	08/09/2023		-	Facility 9 Section 1415 Corp Unit C	EI

General Comment:

This is an Environmental inspection to document spill response and remediation activities at KP Kauffman's Facility 9 Section 1415 Corp Unit C spill (Spill ID #484896) associated with Flowline Facility ID #478843. Operator personnel and an EPA representative were on location during the time of the inspection.

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.

Approximate timeline of on-location activities on August 8, 2023:

- 10:45 arrive on location and begin documentation
- 11:00 contact Supervisors to discuss safety concerns
- 11:05 discuss safety stand down with three Operator personnel on location. Operator personnel locate proper PPE
- 11:10, the three (3) Operator personnel off-location
- 11:15 ECMC EPS Alexander Ahmadian arrives on location
- 11:20 U.S. EPA Region VIII Emergency Response Federal On-Scene Coordinator, David Romero arrives on location
- Multiple Operator and subcontractor personnel return to/arrive on location along with additional personnel throughout the day
- 13:00 KPK provides JSA for all personnel to sign and holds a safety briefing
- 13:30 U.S. EPA Region VIII Emergency Response Federal On-Scene Coordinator, David Romero off location
- 14:00 Dewatering pump arrives on location
- 14:00 Third party consultant arrives on location for routine inspection
- 15:15 end of day inspection
- 15:40 EPS' Alex Ahmadian and Laurel Anderson off-location

For a detailed overview of activities on location and inspection information refer to inspector comments.

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, 1/2 mile buffer for active bald eagle nest, additional surface water, riverine wetland, CR 18, and agricultural land.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		
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:

Type: Flow Line	#		corrective date
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: Initial spill response activities included skimming and dewatering. The hydrovac crews skimmed free product while a dewatering pump was used to transfer water from within the trench into frac tanks/trucks for offsite disposal. Visibly impacted water from within the trench has spilled onto the ground adjacent to the trench to the east and south of the source area. See photo documentation.

Corrective Action: Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Collect soil samples from areas where visibly impacted water was observed outside the source area and trench (see photo documentation) and submit for laboratory analysis of Full Table 915-1 Contaminants of Concern.

Date: 08/29/2023

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: _____

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Comment	Oil absorbent mats and booms were in place at the time of inspection. Mats were observed floating on the surface adjacent to the source area and booms installed at routine intervals between the source area and the culvert adjacent to the earthen dam (~600' north of the source). Earthen dam has been breached and is no longer adequate to stop the spread of visibly impacted water. Water and free product have extended beyond the earthen dam and the final oil absorbent boom adjacent to the culvert.			
Corrective Action	Operator shall install booms properly to completely cover the surface of the stream, booms should be replaced when saturated to prevent desorption. Note: Operator has been instructed to collect additional samples based on these observations.			Date: 08/13/2023
Oily Soil				
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:

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

COGCC Comments

Comment	User	Date
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<p>Detailed overview of activities on location and inspection information: On August 8, 2023, at approximately 10:45 am an ECMC EPS, Laurel Anderson, arrived on location to conduct an environmental inspection at the Facility 9 Section 1415 Corp Unit C spill (Spill ID484896) associated with 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.</p> <p>Upon arrival ECMC EPS noted two (2) of the three (3) Operator personnel on location were not wearing proper PPE (No hard hats and FR shirts). Upon approval from Supervisor's Nikki Graber and Greg Deranleau, ECMC requested a safety stand down until the Operator could provide a Job Safety Analysis (JSA) and Health and Safety Plan (HASP) and all Operator personnel could locate the proper PPE.</p> <p>ECMC Environmental Manager, Greg Deranleau, attempted to notify KPK's Director of EHS & Compliance via telephone but there was no answer and the voicemail box was not set up. At 11:26, Greg Deranleau notified KPK personnel of the safety stand-down and requested copies after indicated KPK does have a HASP in place (though not on location) and that field crews also have JSAs as part of their daily work tickets (also not on location at the time of the safety stand down). KPK EHS Personnel responded in an email stating: "The gentlemen in question fell in the water while placing booms. He has since exited the trench and replaced his FRC shirt. He has been properly trained about PPE. The only free product remaining in the trench is droplets and sheen, which they are removing. The oil on the water has been skimmed by vac truck already."</p> <p>U.S. EPA Region VIII Emergency Response Federal On-Scene Coordinator, David Romero, arrived on location shortly after the safety stand-down. ECMC representatives provided a brief overview of the spill details. Afterwards ECMC and EPA met with Operator personnel to discuss the timeline and details of the spill and response activities as well as the known extent of impacts. The EPA representative asked what the short term remedial measures were going to entail and outline documentation/information the EPA would like to see in a detailed Workplan. The EPA and ECMC provided insight on how to continue addressing the remaining free product within the trench.</p> <p>At approximately 13:00, a JSA was provided to ECMC and EPA representatives followed by a safety meeting. KPK personnel discussed potential safety concerns outlined in the JSA. The EPA representative questioned Operator personnel regarding safety concerns associated with the trench and water within the trench and discussed the importance of having a JSA and HASP on location. Skimming of free product took place throughout the day and a dewatering pump arrived on location at approximately 14:00 to remove water from the trench into frac tanks on location.</p> <p>The EPA representative left the location at approximately 13:30. At approximately 14:00, a third party consultant arrived on location for routine inspection. ECMC representatives discussed what the consultant knew about the spill. The consultant estimated the line was struck around 8:00/8:30 on the morning of August 7, 2023, and believes Colorado 811 utility locates were called in before trenching began and utility locate refresh requests were called in monthly. ECMC representatives asked the consultant if they knew what the locate stakes with orange flags were for - Consultant indicated the stakes were not utility locates but rather intended to mark the location of where the perimeter trench was to be dug by quarry personnel (NCC) next.</p> <p>ECMC representatives performed a final inspection and documentation at approximately 15:15 and left the location at approximately 15:40.</p> <p>ECMC documented impacted trench water outside of the trench in multiple locations throughout the day. In the morning water was observed adjacent to the source area to the east - ECMC representatives discussed the need for BMPs. Later in the afternoon ECMC representatives documented water from the source area spilling onto the ground between the trench and the frac tanks on location south of the source area. Additionally, water (including free produced and a visible sheen) was observed extending north beyond the earthen dam and past the oil absorbent boom adjacent to the culvert going beneath the access road to the extent of trench along the eastern portion of the access road going north. ECMC did not observe an obvious sheen on creek adjacent to the trench to the west nor along the trench beyond the culvert; however, ECMC informed Operator personnel of the</p>	andersoln	08/17/2023
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need for sampling beyond the earthen dam adjacent to the culvert on both sides of the access road and from the creek adjacent to the trench prior to leaving the location.			
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Attached Documents

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

Document Num	Description	URL
403505830	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6228695
710100054	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6228694