

**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:

09/21/2023

Submitted Date:

09/25/2023

Document Number:

710100062

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:

20 Number of Comments

14 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	
Wold, Reed		reed.wold@state.co.us	
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
, KPK		cogcc@kpk.com	All Inspections
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
241092	WELL	PA		GW	123-08880	UPRR 43 PAN AM I 10	EI
241251	WELL	PA		OW	123-09039	UPRR 43 PAN AM I 19	EI
242122	WELL	SI		GW	123-09913	UPRR 43 PAN AM I 27	EI
242187	WELL	SI		OW	123-09978	UPRR 43 PAN AM I 33	EI
318765	LOCATION	AC			-	UPRR 43 PAN AM I-61N68W 10NWSW	EI
318801	LOCATION	AC			-	UPRR 43 PAN AM I-61N68W 10NESW	EI
465479	OFF-LOCATION FLOWLINE	AC	11/19/2020		-	Wellhead Line 10NESW	EI
470495	OFF-LOCATION FLOWLINE	AC			-	Wellhead Line	EI
481679	SPILL OR RELEASE	CL			-	I-33 Flowline	EI

General Comment:

This is an environmental inspection for KP Kauffman:
Spill ID #481679
Remediation Project #26277
Remediation Project #23488
Off-Location Flowline Facility IDs 465479 & 465495
Location Name: UPRR 43 PAN AM I-61N68W#10NESW (Location ID 318801)
Location Name: UPRR 43 PAN AM I-61N68W#10NWSW (Location ID 318765)
Well Name & API: UPRR 43 PAN AM I33 (API 05-123-09913)
Well Name & API: UPRR 43 PAN AM I27 (API 05-123-09978)
Well Name & API: UPRR 43 PAN AM I9 (API 05-123-09039)
Well Name & API: UPRR 43 PAN AM I10 (API 05-123-08880)

Operator personnel was not present during time of inspection. Photos attached to document site conditions. Inspection Date: 9/21/2023

Location			
Lease Road:			
Type	Access		
comment:	Access/leasehold roads have not been maintained and are difficult to traverse.		
Corrective Action	Repair and maintain access/leasehold roads to comply with Rule 600.I.	Date:	10/23/2023
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	WELLHEAD		
Comment:	No wellhead signage present at UPRR 43 PAN AM I 33 Wellhead		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	10/25/2023
Type	OTHER		
Comment:	Sign not posted at oil and gas locations.		
Corrective Action:	Install sign to comply with Rule 605.a.	Date:	10/25/2023
Emergency Contact Number:			
Comment:	No emergency contact information available.		
Corrective Action:		Date:	
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment on location.		
Corrective Action:	Comply with Rule 606.a.	Date:	10/09/2023
Type	TRASH		
Comment:	Trash and debris (concrete, rebar, etc.) was observed near the former wellpads.		
Corrective Action:	Operator shall comply with Rules 606.d.(1)-(3) and 906.a.-d. CA date reflects date from Insp. Doc #s: 710100016 and 689501421.	Date:	05/24/2023
Type	WEEDS		
Comment:	Weeds have become overgrown and extent to heights over 5' tall in some locations. Weeds were observed along the length of flowlines, throughout all locations, at all wellheads/former wellheads, within and around open excavations making many open excavations extremely difficult to see and pose a significant safety risk.		
Corrective Action:	Operator shall comply with Rule 606.c. CA date reflects date from Insp. Doc #s: 710100016 and 689501421.	Date:	05/24/2023
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment: <input type="text"/>			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Inadequate fencing around multiple open excavations.		

Corrective Action:	Install, repair and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended. The site was not attended at the time of the inspection. CA date reflects date from Insp. Doc #: 710100016 and 689501421.	Date:	05/24/2023
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Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities				
Facility ID: <u>241092</u>	Type: <u>WELL</u>	API Number: <u>123-08880</u>	Status: <u>PA</u>	Insp. Status: <u>EI</u>
Facility ID: <u>241251</u>	Type: <u>WELL</u>	API Number: <u>123-09039</u>	Status: <u>PA</u>	Insp. Status: <u>EI</u>
Facility ID: <u>242122</u>	Type: <u>WELL</u>	API Number: <u>123-09913</u>	Status: <u>SI</u>	Insp. Status: <u>EI</u>
Facility ID: <u>242187</u>	Type: <u>WELL</u>	API Number: <u>123-09978</u>	Status: <u>SI</u>	Insp. Status: <u>EI</u>
Facility ID: <u>318765</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>318801</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>465479</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>470495</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>481679</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>CL</u>	Insp. Status: <u>EI</u>

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Quarterly reporting is required for Remediation Project #23488. Operator is past due on quarterly reporting. The last approvable Supplemental Form 27 for Remediation Project #23488 was received on January 16, 2023 (Doc #403139616)

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule. Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated. CA date reflects date from Insp. Doc #: 710100016 and 689501421 for Remediation Project #23488

Date: 04/16/2023

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: Multiple soil stockpiles were observed along the flowlines and next to excavation areas. Stockpiles were unmarked, unlined, and had inadequate/missing BPMs for stormwater runoff.

Corrective Action: Manage waste in compliance with Rule 913.b.iv and ECMC Guidance 913.b.(5)B i-v. CA date reflects date from Insp. Doc #: 710100016 and 689501421

Date: 05/31/2023

Spill/Remediation:

Comment: Quarterly reporting is required for Remediation Project #26277. Operator is past due on quarterly reporting. The last Form 27 was submitted on November 21, 2022 (Doc #403060656).

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule. Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated. CA date reflects date from Insp. Doc #: 710100016 and 689501421

Date: 02/19/2023

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____

Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment _____

Rule 1002.b. requires soil removal and segregation on crop land. As to all excavation operation undertaken after June 1, 1996 on crop land, the operator shall separate and store soil horizons separately from one another and mark or document stockpile locations to facilitate subsequent reclamation. When separating soil horizons, the operator shall segregate horizons based upon noted changes in physical characteristics such as organic content, color, texture, density, or consistency. Segregation will be performed to the extent practicable to a depth of six (6) feet or bedrock, whichever is shallower.

Excavated soils have been stockpiled in numerous locations with other proper segregation.

Corrective Action _____

Operator shall comply with Rule 1002.b.
The corrective date is the date the location was observed out of compliance, as it should be in compliance with Rule 1002.b. at all times.

Date **09/21/2023**1002c. PROTECTION OF SOILS Fail

Comment _____

Rule 1002.c. requires all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.

No BMPs in place to protect numerous soil stockpiles soils from degradation.

Corrective Action _____

Operator shall comply with Rule 1002.c.
The corrective date is the date the location was observed out of compliance, as it should be in compliance with Rule 1002.c. at all times.

Date **09/21/2023**1002E. SURFACE DISTURBANCE MINIMIZATION Fail

Comment _____

Access roads, locations and wellpads have no been maintained to minimize surface disturbance.

Corrective Action _____

Operator shall comply with Rule 1002.e.

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____

Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____

Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____

Production areas have been stabilized? _____

Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____

Recontoured _____

Perennial forage re-established _____

Non-Cropland

Top soil replaced _____

Recontoured _____

80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment _____

Corrective Action _____

Date _____

Overall Interim Reclamation**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____

Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____

Pit mouse/rat holes, cellars backfilled _____

Debris removed _____

No disturbance /Location never built _____

Access Roads Regraded _____

Contoured _____

Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____

Locations, facilities, roads, recontoured _____

Compaction alleviation _____

Dust and erosion control _____

Non cropland: Revegetated 80% _____

Cropland: perennial forage _____

Weeds present _____

Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment:						Date
Corrective Action:						
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		
Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment:	Existing stormwater BMPs have not been installed properly and/or maintained.					Date: 05/31/2023
Corrective Action:	Comply with Rules 1002.f.(1)-(2). CA date reflects date from Insp. Doc #s: 710100016.					
Pits:	<input type="checkbox"/> NO SURFACE INDICATION OF PIT					

COGCC Comments

Comment	User	Date
Operator will remain out of compliance until each corrective action has been resolved.	andersoln	09/25/2023

Attached Documents

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

Document Num	Description	URL
710100064	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6262908