

**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:

11/06/2023

Submitted Date:

11/09/2023

Document Number:

710100073**FIELD INSPECTION FORM**Loc ID 478672 Inspector Name: Anderson, Laurel 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:**14 Number of Comments7 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
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Graber, Nikki		nikki.graber@state.co.us	
KPK		cogcc@kpk.com	<a href="#">All Inspections</a>
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Motisi, Dan		dmotisi@kpk.com	<a href="#">KP Kauffman - Environmental Geologist</a>
Peterson, John	303-550-8872	jpeter@kpk.com	<a href="#">Director EHS &amp; Compliance</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
482598	SPILL OR RELEASE	AC			-	3 Farms Consolidation line	EI

**General Comment:**

This is an environmental inspection for Spill ID 482598 (3 Farms Consolidation Line). On November 6th, 2023, ECMC Environmental Protection Specialist, Laurel Anderson, met KPK personnel on location to witness soil sampling from the:

- area in and around the former stockpile (composite soil samples SP-01 through SP-08)
- on either side of the culvert (inlet and outfall) beneath/adjacent to the former stockpile location, and (discretete soil samples Culvert North and Culvert South)
- from ~6" beneath the base of the excavation near the center of the excavation (BH-07). The sample was collected at ~6" beneath the extent of the excavation (reported as 6' deep) that has been open and exposed since October of 2022.

Excavation extent is located:

- ~340' from a potable household/domestic well and occupied structure
- ~175' from landowner shop
- ~325' from wetlands
- ~400' from 100-year floodplain
- ~325' from an irrigation ditch
- ~400' from Big Dry Creek
- Within a high priority habitat

The former stockpile is located in a topographic low. The area disturbed from the stockpiled soil and equipment transporting soil from the excavation to the stockpile overlaps a berm which runs E-W and a culvert which runs N-S through the berm. South of the berm is a topographic low and a drainage the runs parallel to the berm until it reaches another berm along the eastern fenceline, at which point the drainage turns south toward the irrigation ditch and Big Dry Creek.

The remedial excavation remains open, water has infiltrated the excavation, sidewalls have eroded in some areas, animal tracks, weeds and debris are present throughout the excavation and location, multiple capped and uncapped flowlines are located within the excavation, no BMPs are in place to control stormwater run-in to the open excavation nor run-off from the disturbed areas, fencing around the excavation varies (part cattle fencing, part orange construction fencing, part missing, part property fencing, etc.) and is inadequate.

Any corrective actions from previous forms in relation to Spill ID 482598 that have not been addressed are still applicable.  
Photos attached document site conditions.

Location				
Overall Good: <input type="checkbox"/>				
<b>Signs/Marker:</b>				
Type	OTHER			
Comment:	No warning/hazard placards present at open excavation.			
Corrective Action:		Date:		
Emergency Contact Number:				
Comment:	No Operator or emergency contact information present.			
Corrective Action:		Date: _____		
<b>Good Housekeeping:</b>				
Type	WEEDS			
Comment:	Ongoing issue: Weeds beginning to grow in and around the open excavation.			
Corrective Action:	Comply with Rules 606.c. and 1003.f.			Date: 11/02/2023
Type	OTHER			
Comment:	Ongoing issue: Trash/debris/unused equipment. Torn construction fencing, flexpipe coupling, flowlines were observed within the open excavation and around location.			
Corrective Action:	Comply with Rules 606., 902.c., and 1002.f.(2)D.			Date: 11/16/2023
Overall Good: <input type="checkbox"/>				
<b>Spills:</b>				
Type	Area	Volume		
In Containment: No				
Comment: _____				
<input type="checkbox"/> Multiple Spills and Releases?				
<b>Fencing/:</b>				
Type	OTHER			
Comment:	Ongoing issue: Inadequate fencing around open excavation. The open excavation is located in the property owner's back yard (~370' from their back door), water and animal tracks were observed within the open excavation.			
Corrective Action:	Operator shall immediately 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 and COGCC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc.			Date: 11/07/2023
<b>Equipment:</b>				
Type: Flow Line	#		corrective date	
Comment:	Multiple flowlines of unknown status were observed exposed within the open excavation.			
Corrective Action:	Comply with ECMC 1100 Series Rules -Repair all flowlines intended for return to service per Rule 1102.j. -For shut-in or out of service off-location flowlines or crude oil transfer lines, Operator shall comply with Rule 1102.o. -For flowlines being abandoned, Operator shall comply with ECMC Rule 1105 -Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per Rule 1102.j.7 (at well ASAP/second endpoint/facility prior to and during repair). Provide confirmation documentation of completion (photos) to ECMC Integrity Inspector and Engineer.			Date: 12/09/2023





**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Operator failed to submit an approvable Form 27, Site Investigation and Remediation Workplan and Form 19, Supplemental Spill/Release Report requesting closure no later than 90 days after the discovery of a Spill or Release, violating Rule 912.b.(6).

Corrective Action: Operator shall submit a replacement Form 27, Site Investigation and Remediation Workplan, and a Supplemental Form 19, Spill/Release Report requesting closure of Spill/Release Point ID: 482598. An NOAV (Doc #403465295) has been issued with a corrective action due date of 8/13/2023. Note: ECMC received a replacement Form 27 on November 11, 2023, and is in process for review.

Date: 08/13/2023

Reportable: \_\_\_\_\_ 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)

Comment: E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905. Pieces of the liner for impacted soil stockpiled on location were observed throughout the location. Pieces/portions of fiberglass flowline were observed on location (including outside the open excavation) and multiple uncapped/improperly capped flowlines were observed within the open excavation. Soil cuttings from soil borings were observed on the ground outside the excavation.

Corrective Action: Operator shall properly store, handle, transport, treat, recycle, and/or dispose E&P waste in accordance with Rule 905.

Date: 11/22/2023

**Spill/Remediation:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

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
<p><b>Comment:</b> Remedial excavation remains open. Water was observed within the open excavation at the time of inspection. No BMPs to control stormwater run-on to the open excavation nor runoff from the work area were observed at the time of inspection. Rills have formed from run-in to the excavation and are beginning to destabilize the walls of the excavation and fencing in some areas.</p> <p><b>Corrective Action:</b> Install BMPs in accordance with 1002.f.(2) to prevent run-on and runoff.</p> <p><b>Date:</b> 08/08/2023</p> <p><b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

**COGCC Comments**

Comment	User	Date
<p>The following corrective action was required on Doc #710100041: "Manage stockpiles in compliance with Rule 1002.(c). Manage waste in compliance with Rule 913.b.(3) and ECMC Guidance 913.b.(5)B.i-v. and collect soil samples from the stockpile area for laboratory analysis of all Table 915-1 contaminants of concern.". The corrective action due date of August 22, 2023, was missed; Soil sampling required in the corrective action above was performed during this inspection (11/6/2023).</p> <p>ECMC issued a Notice of Alleged Violation (NOAV) on July 14, 2023, for the following reason: "Operator failed to prevent pollution and adverse environmental impacts on air, water, soil, or biological resources resulting from Oil and Gas Operations and failed to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources, and prevent the unauthorized discharge of oil, violating Rule 902.". The conditions of the Workplan attached to the July 14, 2023, NOAV were not met.</p> <p><b>Site Conditions:</b></p> <ul style="list-style-type: none"> <li>-Remedial excavation remains open.</li> <li>-No warning placards/signage present at excavation.</li> <li>-No Operator or emergency contact information is present on location</li> <li>-No stormwater BMPs were observed - Stormwater erosion continues</li> <li>-Stormwater erosion into the excavation has caused rills to develop and undermine/destabilize excavation sidewalls</li> <li>-Excavation fencing installed is inadequate. To ensure the safety of the public, livestock, and wildlife near open excavations, Operator will fence or cover the excavation in a manner that prevents wildlife, livestock, and unauthorized personnel from entering the work zone when unattended. The choice of fencing or cover material used must be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc.</li> <li>-Weeds, debris, animal tracks and water were observed within the base of the open excavation.</li> <li>-Weeds, trash/debris and E&amp;P waste were observed throughout the location.</li> <li>-Multiple uncapped/improperly capped flowlines extend into the open excavation.</li> <li>-A buried utility line has been cut and is exposed in the northeastern corner of the excavation.</li> <li>-Monitoring wells have been installed on location</li> <li>-A domestic/household use well located to the north of the open excavation is required to be sampled on a monthly basis - ECMC has not received analytical data for this well since the first part of the year (2023).</li> </ul>	andersoln	11/08/2023

**Attached Documents**

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

Document Num	Description	URL
710100075	3 Farms Consolidation Line Photo Documentaion	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6316936">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6316936</a>

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