

**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:

10/16/2023

Submitted Date:

11/03/2023

Document Number:

710100065**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Anderson, Laurel 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:**8 Number of Comments4 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
, KPK		cogcc@kpk.com	<a href="#">All Inspections</a>
Graber, Nikki		nikki.graber@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	<a href="#">Director EHS &amp; Compliance</a>
Watzman, Ross	303-825-4822	rwatzman@kpk.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
482625	SPILL OR RELEASE	AC	09/12/2022		-	UPRR 43 Pan Am I #23	EI

**General Comment:**

This is an environmental inspection for the UPRR 43 Pan Am I-23 Spill (Spill ID 482625). On October 16, 2023, ECMC inspectors met KPK representatives and their subcontractor, to witness soil boring and monitoring well installation. Below is a summary of observations made by ECMC during monitoring well installation:

MW-4 was installed northwest of the open excavation on the neighboring property and was completed as a permanent 2" stickup monitoring well. Dark gray stained coarse grained soil (gravel and sand) was observed around 12-13' bgs. Depth to water was estimated at ~13' bgs.

MW-5 was installed west of the open excavation on the neighboring property and was completed as a permanent 2" stickup monitoring well. Depth to water was estimated at ~12' bgs.

MW-6 was installed west of the southern extent of the open excavation on the neighboring property and was completed as a permanent 2" stickup monitoring well. Depth to water was estimated at ~ 9' bgs.

MW-7 was installed north of the open excavation on and was completed as a permanent 2" flushmount monitoring well. Depth to water was estimated at ~ 8' bgs. Light gray stained soil (sandy-silt) was observed around 7' bgs.

MW-8 Was installed north of the central portion of the open excavation and was completed as a permanent 2" flushmount monitoring well. Depth to water was estimated at ~ 8' bgs. Light gray stained soil (sandy-silt) was observed around 7' bgs.

-The open excavation measured approximately 175' (E-W) 115' (N-S) and is filled with groundwater to ~6' BGS

-A previously installed 1" stickup monitoring well (MW-2) installed ~5' north of the central portion of the current excavation extent has been bent and the PVC broken off at the surface.

-One dewatering pump was observed adjacent to the "irrigation retention pond for race track" southeast of the open excavation. Hoses associated with this dewatering pump run northwest around the open excavation to a drainage west of the racetrack.

-The exposed and unsupported concrete stormwater line damaged during initial excavation activities has since collapsed into the open excavation. A replacement line has been installed and is visible across the open excavation. The exposed portion of the line is unsupported and has begun to sag.

-A ~500-bbl frac tank used during dewatering of the excavation remains on location north of the excavation.

Site photographs are attached to document monitoring well locations and site conditions.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

**Location**Overall Good: ☐

<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	No Operator contact information present. No warning signage present around the open excavation.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		Date: _____
Corrective Action:		

**Good Housekeeping:**

Type	OTHER		
Comment:	Trash and weeds observed around and within open excavation.		
Corrective Action:	Comply with Rule 606.	Date:	11/17/2023

Overall Good: ☐

<b>Spills:</b>				
Type	Area	Volume		

In Containment: No

Comment: A COA on Doc # 403431876 states: "In accordance with Rule 914, Operator shall define the horizontal extent of impacts. If impacts are observed during soil boring installation a step out boring(s) shall be installed to define the horizontal extent of impacts to soil and groundwater. The borings shall be installed within 45 days." The 45 day deadline (October 13, 2023) has passed prior to commencement of this work.

☐ Multiple Spills and Releases?

<b>Fencing/:</b>			
Type	OTHER		
Comment:	Fencing installed does not surround the full extent of the open excavation and has been installed in close proximity to the sidewalls of the open excavation. Excavation sidewalls are unstable and have started to collapse.		
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 Operators fence or cover open remediation excavations to prevent access when sites are not attended.	Date:	11/17/2023

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	482625	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI

--

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

Type of Spill: \_\_\_\_\_

Estimated Spill Volume: \_\_\_\_\_

Comment: Form 19 has been open greater than 90 days, Operator is out of compliance with Rule 912.b.(6)

Corrective Action: Pursuant to Rule 912.b.(6) Operator was required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure. The Form 19 Supplemental Report for closure was due by Oct 23, 2022.

Date: 10/23/2022

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: \_\_\_\_\_

### 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: No adequate BMPs in place to control stormwater run-in or runoff.

Corrective Action: Install BMPs in accordance with 1002.f.(2) to prevent erosion run-in and runoff.

Date: 11/17/2023

**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
403584217	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6309545">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6309545</a>
710100066	Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6309544">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6309544</a>