

**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:

03/26/2024

Submitted Date:

04/11/2024

Document Number:

697602325

FIELD INSPECTION FORMLoc ID _____ Inspector Name: _____ On-Site Inspection ☐
Ahmadian, Alexander 2A Doc Num: _____**Operator Information:**

ECMC 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:**

13 Number of Comments

1 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 |
|------------------|--------------|-----------------------------|---|
| Anderson, Laurel | | laurel.anderson@state.co.us | |
| Paul Peronard | | Peonard.Paul@epa.gov | U.S EPA Federal On-Scene Coordinator |
| , KPK | | cogcc@kpk.com | All Inspections |
| Robinson, Taylor | | taylor.robinson@state.co.us | |
| Andrea Reyna | | andrea.reyna@state.co.us | EIT - Field Services Section (Field Unit 3) |
| MacLaren, Joe | | joe.maclaren@state.co.us | |
| Taylor Bowker | | Bowker.Taylor@epa.gov | U.S EPA Federal On-Scene Coordinator |
| Watzman, Ross | 303-825-4822 | rwatzman@kpk.com | all inspections. |
| Graber, Nikki | | nikki.graber@state.co.us | |
| Peterson, John | 303-550-8872 | jpetereson@kpk.com | KPK Director EHS & Compliance |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|-----------------|--------|-------------|------------|---------|---------------|-------------|
| 478839 | Flowline System | AC | 12/17/2020 | | - | Facility 8 | EI |

General Comment:

This is an ECMC environmental inspection for March 26th, 2024, in response to a spill (Incident Report #1394405) reported to the U.S. Environmental Protection Agency (EPA) National Response Center (NRC) on March 21, 2024, at 11:14am MT (NRC Incident Report #1394405). The Office of Emergency Preparedness and Response (OEPR) within the Colorado Department of Public Health and Environment (CDPHE) reiterated the information provided in the NRC Incident Report at 11:20am MT via the Colorado Environmental Spills or Releases Reporting Form.

The spill occurred along the Sebold Dorothy Consolidation Line. The Sebold Dorothy Consolidation Line is registered as an 8" steel segment of the Facility 8 Flowline System (Facility ID #478839).

On March 26, 2024, ECMC Environmental Protection Specialists (EPS), Laurel Anderson and Alex Ahmadian arrived on location at approximately 14:50 to inspect the remedial progress made on the spill. There were no KP Kauffman (KPK/Operator) personnel or contract environmental personnel on location at the time of the inspection.

There was visible oil stained soil and vegetation extended approximately 450' at the surface. The oil and produced water from the flowline travelled from where the spill surfaced to the southeast 50' along a low then travelled down the west bank of Brighton Ditch and into Brighton Ditch. Brighton Ditch was still dry at the time of inspection and has not been turned on for the season. Once in Brighton Ditch fluids traveled north/north northeast approximately 400 feet. Animal prints were observed in oil stained soil within the ditch. The excavation at the flowline where the spill originated had grown, and a strong hydrocarbon odor, stained soil, and vegetation were present where the spill surfaced.

The root cause of the spill is unknown. Stained soil within and beneath the 8" line appeared dark gray in comparison to the dark brown oil stained soil above where the spilled fluids travelled along the surface.

ECMC personnel left the spill location at approximately 15:20.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

| | | | |
|--------------------|--------------------------------------|--|------------------|
| Type | TRASH | | |
| Comment: | Trash and debris onsite. | | |
| Corrective Action: | Operator shall comply with Rule 606. | | Date: 04/03/2024 |

Overall Good: ☐**Spills:**

| | | | | |
|------|------|--------|--|--|
| Type | Area | Volume | | |
|------|------|--------|--|--|

In Containment: No

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

| | | | |
|--------------------|---|--|-------|
| Type | OTHER | | |
| Comment: | Operator has installed orange construction fencing around the open excavation. Operator shall continuously monitor 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 ECMC 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. | | |
| Corrective Action: | | | Date: |

Venting:

| | | | |
|--------------------|--|--|-------|
| Yes/No | | | |
| Comment: | | | |
| Corrective Action: | | | Date: |

Flaring:

| | | |
|--------------------|--|-------|
| Type | | |
| Comment: | | |
| Corrective Action: | | Date: |

| Inspected Facilities | | | | | | | | | |
|--|--------|-------|----------|-------------|---|---------|----|---------------|----|
| Facility ID: | 478839 | Type: | Flowline | API Number: | - | Status: | AC | Insp. Status: | EI |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 | | | | | | | | | |
| | | | | | | | | | |

Environmental**Waste Management:**

| Type | Management | Condition | GPS (Lat) | (Long) |
|-------------------|---|-----------|-----------|--------|
| Oily Soil | | | | |
| Comment | A frac tank and oily soil are being stockpiled on location on liners with earthen berm and filtrex wattles. Oil absorbent booms have been placed within Brighton Ditch and Big Dry Creek. Spill response and site investigation and remediation activities for this spill and previous spills by KPK have disturbed the majority of this parcel of land. Operator shall 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). | | | |
| Corrective Action | | | | Date: |
| | | | | |
| Comment | Additionally, Operator shall manage waste in compliance with Rule 913.b.(5)B and ECMC Guidance 913.b.(5)B i.-v. and install BMPs in accordance with 1002.f.(2) to prevent runoff and runoff and completely contain impacts. Operator shall provide photo documentation of stockpile and frac tank liner integrity via Form 19 or Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil/water has spilled or been tracked outside of containment for complete Table 915-1 Contaminants of Concern. | | | |
| Corrective Action | | | | Date: |

Spill/Remediation:

| | | | |
|--------------------|---|--|--|
| Comment: | On 3/26/2024, ECMC observed hydrocarbon stained soils in-situ within the Brighton Ditch and the open excavation where the spill surfaced. Free product had been removed and the remedial excavation had grown since the last inspection. A visible sheen was seen on groundwater within the excavation. Soil had been visibly scraped off the Brighton Ditch, however stained soil was still visible in the Ditch. Monitoring wells have been installed along the east side of the flowline and along the sides of the Brighton Ditch. Operator shall control and contain spills/releases and clean up per Rule 912.a. Per Rule 912.b.(4), the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered. The Supplemental Form 19 is due no later than March 31, 2024. | | |
| Corrective Action: | | | |
| | Date: _____ | | |

Emission Control Burner (ECB): _____

Comment: _____

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

ECMC Comments

| Comment | User | Date |
|---|----------|------------|
| The spill extent within Brighton Ditch parallel's Big Dry Creek to the north. Visibly impacted soils are ~60' from Big Dry Creek in some areas. The spill extent: -Is within a mapped USFWS high priority habitat buffer for Aquatic Native Species Conservation Waters -Is within the buffer for NWI wetlands -Is within a 100-year floodplain -Is within Weld County, Colorado -Is ~60' from navigable water (Big Dry Creek) -Has impacted groundwater (free product observed on groundwater within Brighton Ditch) -Is within 1/4 mile of two residential wells, two occupied structures, agricultural land, livestock, CR 8, and 5 separate spills/releases by this Operator (KPK). | ahmadiaa | 04/11/2024 |

Attached DocumentsYou can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

| Document Num | Description | URL |
|--------------|----------------------|---|
| 403751000 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6504762 |
| 697602326 | Photolog | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6504758 |