

**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:

04/22/2024

Submitted Date:

04/22/2024

Document Number:

710100192

FIELD INSPECTION FORM

Loc ID 318207 Inspector Name: Anderson, Laurel On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

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

Findings:

- 13 Number of Comments
- 9 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
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Kauffman, KPK		cogcc@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Brown, Kari		kari.oakman@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240872	WELL	PR	04/27/1976	OW	123-08660	DITLEV-SIMONSEN C 1	PR
479608	Flowline System	AC			-	Facility 4 Consolidation	EI
485898	SPILL OR RELEASE	AC	02/12/2024		-	Facility 4 @ Ditlev C1	EI

General Comment:

This is an Environmental inspection conducted on April 22, 2024, by ECMC Environmental Protection Specialist, Laurel Anderson, to document ongoing remediation activities at the Facility 4 @ Ditlev C1 Spill.

Spill ID No: 485898

Facility ID No: 479608 (Facility 4 Consolidation)

DITLEV-SIMONSEN C1 Well API: 05-123-08660

Note: Operator shall submit a FIRR to document corrective actions.

Any corrective actions from previous inspections, comments/conditions of approval from previously denied/approved forms that have not been addressed remain applicable.

No Operator or contract personnel were on location at the time of inspection.

Photos attached to document site conditions.

Note: Immediate corrective action is required to stop the further spread of E&P waste from the work area

- Operator has disturbed an excessive amount of surface area
- Oil stained oil absorbent mats have been blown onto adjacent field in multiple directions
- Orange construction fencing surrounding open excavation is torn, improperly installed and is inadequate
- Contaminated soil stockpile BMPs are inadequate and impacted soils have spilled and spread outside containment and been further tracked out of the immediate work area
- Used bailer, oil soaked absorbent mats were observed on the ground outside of containment
- Contaminated soil stockpile does not have fencing or warning signage
- Pieces of torn liner were observed throughout the location (both stuck in dirt and windblown)
- Water, free product and visibly impacted soil were observed within the open excavation
- Animal prints were observed in dirt around the open excavation
- Wellhead signage is faded
- No caution/warning signage was noted at the open excavation
- Trash/debris, weeds and unused equipment were observed throughout the location (Note: some unused equipment has been removed from the location)
- Oil stained soil was observed around the wellhead
- Audible sound not from flowlines within the open excavation - Sound appears to be from fluids flowing through the HDP flowlines within the open excavation

Incident information: Spill Discovery Date: 1/17/2024

Spill is located within the Town of Frederick and with 1/4 mile of multiple child care facilities, residences, parks, trails, and wetlands. Based on ECMC mapping data, the Facility 4 @ Ditlev C1 Spill is located approximately 300' from Centennial Park, approximately 350 feet from a pond, approximately 700 feet from a mapped wetland (freshwater emergent), approximately 800 feet from baseball fields, and approximately 1,200 feet from dense suburban development.

Location			
Lease Road:			
Type	Access		
comment:	Ongoing issue: Access road to the wellhead and spill is difficult to traverse.		
Corrective Action:	Operator shall comply with Rule 1002.e. Access roads shall be located, adequately sized, constructed, and maintained so as to reasonably control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and April 22nd, 2024. CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action.	Date:	<u>03/29/2024</u>

Overall Good:

Signs/Marker:			
Type	WELLHEAD		
Comment:	Ongoing issue: Wellhead signage faded.		
Corrective Action:	Install sign to comply with Rule 605.d. ECMC observed the Operator remaining out of compliance with Rule 605.d. on April 22nd, 2024. CA due date listed as CA due date on FIR Doc #710100190 when corrective action was required.	Date:	<u>06/19/2024</u>

Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: _____

Good Housekeeping:			
Type	STORAGE OF SUPL		
Comment:	Ongoing issue: Unused miscellaneous supplies/equipment is being stored on location. Note: Some unused equipment has been removed.		
Corrective Action:	Per FIR Doc #697602260: "Comply with Rule 606." Compliance with Rule 606 was required by February 21, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602260 when issue was first noted.	Date:	<u>02/21/2024</u>
Type	WEEDS		
Comment:	Ongoing issue: Weeds observed on location and within the open excavation.		
Corrective Action:	Operator shall comply with Rules 606.c. and 1003.f. by March 14, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action.	Date:	<u>03/14/2024</u>
Type	TRASH		
Comment:	Ongoing issue: Trash and debris observed on location.Ongoing issue: Trash and debris observed on location.		
Corrective Action:	Per FIR Doc #697602260: "Comply with Rule 606." Compliance with Rule 606 was required by February 21, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602260 when issue was first noted.	Date:	<u>03/14/2024</u>

Overall Good:

Spills:			
Type	Area	Volume	
PW/CO	WELLHEAD		
Comment:	Ongoing issue: Oil stained soil was observed around the wellhead.		

Corrective Action:	<p>Comply with ECMC Rules:</p> <p>Operator shall immediately control and contain spills/releases and clean up per Rule 912.a.</p> <p>Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts (photo documentation and waste disposal manifests) to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR.</p> <p>Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.</p> <p>ECMC observed the Operator remaining out of compliance with Rule 912 on April 22nd, 2024. CA due date listed as CA due date on FIR Doc #710100190 when corrective action was required.</p>	Date: <u>04/26/2024</u>
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In Containment: No

Comment:

Multiple Spills and Releases?

<u>Fencing/:</u>			
	Type	OTHER	
	Comment:	<p>Ongoing issue: Inadequate fencing around open excavation. Fencing around open excavation is torn and inadequate. Excavation was unattended at the time of inspection. Per FIR Doc #710100133: "Orange construction fencing is not appropriate for site conditions."</p> <p>Note: Continuous monitoring and maintenance of best management practices to protect the environment, public health, safety and welfare and the environment is required.</p>	
	Corrective Action:	<p>Per CA on FIR Doc #710100133: "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 ECMC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences/schools, depth of excavation, presence of ground or surface water, livestock, wind, etc."</p> <p>Compliance with Rule 913.b.(5)B.i. and ECMC Guidance 913.b.(5)B. i.-v. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #710100133. Immediate corrective action is required.</p>	Date: <u>02/05/2024</u>

<u>Venting:</u>			
	Yes/No		
	Comment:		
	Corrective Action:		Date:

<u>Flaring:</u>			
	Type		
	Comment:		
	Corrective Action:		Date:

Inspected Facilities

Facility ID: 240872 Type: WELL API Number: 123-08660 Status: PR Insp. Status: PR

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 479608 Type: Flowline API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 485898 Type: SPILL OR 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	Piles	Inadequate	
Comment	<p>Ongoing issue: Oily soil and absorbent mats remain stockpiled on location. The liner and perimeter berm surrounding the stockpile have been driven over and oily waste has spilled and spread outside of the lined area and further spread/tracked outside the fenced area by vehicles and snowmelt. Oil stained absorbent mats have been blown from the stockpile onto the adjacent field. Oil soaked mats and a used bailer were observed outside secondary containment adjacent to the stockpile and excavation. An excessive amount of surface area including the adjacent field has been disturbed by site investigation and remediation activities.</p> <p>Remediation activities are not being conducted in accordance with Rules 905.e. and 913.b.(5).B.i.-iv.</p>		
Corrective Action	<p>Per FIR Doc #697602260: "Properly treat or dispose of E&P waste in accordance with Rule 905."</p> <p>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). 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 liner integrity via Form 19 or Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil has spilled outside containment Full Table 915-1 Contaminants of Concern.</p> <p>Compliance with Rule Rule 905 was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024. Immediate corrective action is required.</p>		<p>Date: <u>03/07/2024</u></p>

Spill/Remediation:

Comment:	<p>Ongoing issue: Visibly impacted soil remain in-situ in the open excavation in contact with water. Free product and an oily sheen were observed on the water. Note: Oil continues to leak from cut pipe within the open excavation onto soil and groundwater below.</p>		
Corrective Action:	<p>Per CA on FIR Doc #710100133: "In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered."</p> <p>Per CA on FIR Doc #697602260: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered."</p> <p>Impacts to soil and groundwater remain insitu. CA due date backdated to due date on FIR Doc #697602260.</p>		<p>Date: <u>02/19/2024</u></p>

Emission Control Burner (ECB): _____

Comment: _____

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

Attached Documents

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

Document Num	Description	URL
403764559	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6519748
710100193	2024_0422_Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6519737