

**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:

05/30/2024

Submitted Date:

06/04/2024

Document Number:

697602377

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:**

9 Number of Comments

5 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
,		cogcc@kpk.com	All Inspections
Anderson, Laurel		laurel.anderson@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Peterson, John		jpeter@kpk.com	KPK environmental
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Graber, Nikki		nikki.graber@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
475954	OFF-LOCATION FLOWLINE	AC	01/12/2021		-	Wellhead Line	EI
475955	OFF-LOCATION FLOWLINE	AC	01/12/2021		-	Wellhead Line	EI

General Comment:

This is an environmental inspection for the Johnson 1 Flowline. Operator personnel were on location performing flowline repair activities. Photos are attached to document conditions.

Current site conditions: At the Johnson 1 Flowline, the excavation has grown. The stockpile containing impacted soil still remains on site. A sheen was observed on the water within the open excavation.

Excavation extent is:

Within a 100 year floodplain

Within the Town of Frederick

<10' from a walking path

~25' from Godding Hollow stream

~20' from wetland

~400' from an occupied structure

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Ongoing issue: Weeds present throughout entire location.		
Corrective Action:	Per CA on FIR Doc #710100146. "Comply with Rules 606.c. and 1003.f." Compliance with Rules 606.c. and 1003.f. was required by February 19th, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024. CA due backdated to FIR Doc #710100146 when issue was first observed.		Date: <u>02/19/2024</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: Paraffin and a sheen were observed on groundwater within the open excavation.

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

Type	LOCATION		
Comment:	Fencing installed around the entire spill area (excavation and soil stockpile) has ripped in multiple areas.		
Corrective Action:	Per CA on FIR Document #710100146, "Operator shall continuously monitor and maintain [BMPs] 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. when sites are not attended." Compliance was required on 2/5/24. ECMC observed the Operator out of compliance on 2/12/24, and gave the Operator 1 week (2/19/24) to correct the issue. ECMC observed the Operator out of compliance again on 2/29, 3/1, 4/3 & 4/22, 2024. CA due date back dated to CA due date on FIR Doc #697602258.		Date: <u>02/19/2024</u>

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	475954	Type:	OFF-	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	475955	Type:	OFF-	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	Oily waste remains stockpiled on location. The stockpile liner and oily soil remain on location. The liner and perimeter berm surrounding the stockpile has 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.				
Corrective Action	Per CA on FIR Doc #710100146: "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. 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." Compliance with Rule 905.e. and Rule 913.b.(5).B.i.-v. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 12th, 2024 and gave the Operator 4 days to correct the issue (FIR Doc #697602258). ECMC observed the Operator remained out of compliance on February 29th, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602258.				Date: 02/05/2024
Spill/Remediation:					
Comment:	Stained soil has been observed outside of the excavation. Visibly impacted soil remains insitu and stockpiled on location with inadequate BMPs. A sheen and free product were observed on water within the open excavation.				
Corrective Action:	Per CA on FIR Doc #710100146: "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." Per CA on FIR Doc #697602258: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered."				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

Comment: Inadequate BMPs in place to control stormwater run-on and runoff. Impacts have spread beyond the fenced work area via runoff and trackout.

Corrective Action: Per CA on Field Inspection Report Document # 710100146, "Operators will properly store, handle and manage all E&P waste to prevent contamination of stormwater, surface water, groundwater and soil. Manage surface water and stormwater around spill site in manner that prevents impacts to those matrices. Install BMPs in accordance with 1002.f.(2) to prevent runoff and runoff and completely contain impacts."

Compliance with Rule 1002.f.(2) and continuous monitoring and maintenance of BMPs was required by February 6th, 2024. ECMC observed the Operator out of compliance on February 12th and 29th, March 1st, April 3rd and 22nd, 2024. CA due date backdated to FIR Doc #710100146 when the issue was first observed.

Date: 02/06/2024

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
403812791	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6572842
697602379	Photolog	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6572841