

**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:

09/20/2024

Submitted Date:

09/25/2024

Document Number:

710100268

FIELD INSPECTION FORM

Loc ID _____ 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:

- 16 Number of Comments
- 6 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
Marette, Brandon		brandon.marette@state.co.us	Northeast Region Energy Liason
Kauffman, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	303-825-4822	rwatzman@kpk.com	
Hamous-Miller, Lexi		lexi.hamous-miller@state.co.us	CPW NE Region Land Use Coordinator
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
MacLaren, Joe		joe.maclaren@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478833	Flowline System	AC	12/17/2020		-	Facility 3	EI
487690	SPILL OR RELEASE	AC			-	Facility 3 @ Rasmussen Flowline	EI

General Comment:

This is an environmental inspection for Spill ID 487690 Facility 3 @ Rasmussen Flowline. Any corrective actions from previous inspections that have not been addressed are still applicable. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Spill is located within:

-A publicly maintained road (Preserve Drive - has been closed and signage installed)

-The Town of Frederick

-A bald eagle roost high priority habitat with no wildlife protection equipment (e.g. netting) installed over open excavation

In close proximity to:

-Unmapped, unlined irrigation ditch (described as irrigation water running through field channel in attached photo documentation) located

~50' E, discharges to Boulder Creek

-Unmapped surface water pond (~140' N)

-Multiple occupied structures

-Osprey platform (<500' SW)

Free product and was observed on groundwater within the open excavation.

Stained soil remains in situ and is visible within the open excavation.

Excavation fencing is torn and has not been properly installed around the perimeter of the excavation.

"Clean" soil was stockpiled on location with inadequate stormwater BMPs

ECMC received a complaint (Doc #403911640) on 9/5/2024 in response to this spill.

CORRECTIVE ACTIONS REQUIRED ON FIR DOC #710100245 ARE PAST DUE

Location

Overall Good:

Signs/Marker:

Type	OTHER		
Comment:	No signage present at open excavation.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:	No emergency contact information present.		
Corrective Action:		Date:	

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type	OTHER		
Comment:	Orange construction fencing has been installed around the open excavation; however, fencing is torn and does not encompass the entire perimeter of the excavation and is not appropriate for site conditions. CA due date backdated to FIR Doc #710100245 when corrective action was first required.		
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 ECOM 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.		Date: 09/10/2024
Type	OTHER		
Comment:	Operator has installed traffic barricades along Preserve Drive; however, the barricades do not block the entire roadway and no warning signage was observed.		
Corrective Action:		Date:	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Location Construction

Location ID: 487690 CDP: _____

Comment:

Corrective Action:

Date: _____

Form 2A COAs:

Comment:

Corrective Action:

Date: _____

Wildlife BMPs:

Comment: Location lies within the CPW high priority habitat buffer for Bald Eagle Roost. No wildlife protection equipment (e.g. netting) has been installed at the open excavation. CA due date back dated to CA on FIR Doc #710100245 when corrective action was first required. CORRECTIVE ACTION IS REQUIRED AND IS PAST DUE.

Corrective Action: **Comply with Rule 902.b to IMMEDIATELY INSTALL or repair wildlife protection equipment. The location will remain out of compliance until the corrective action has been resolved. Remediation and other work needs to be completed prior to the start of nesting season.**

Date: **09/10/2024**

Comment:

Corrective Action:

Date:

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities

Facility ID: 478833 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: 487690 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Complaint

Comment: **ECMC received a Complaint (Doc #403911640) from the landowner on 9/5/2024. The complaint details the landowners notes on spill response and remediation activities to date and includes email correspondence with KPK. The complaint indicates KPK did not promptly respond to notice of the spill when contacted by the landowner and other Operator personnel, KPK did not make timely repairs to the flowline (flowline was not exposed until 8/26/2024, flowlines was not properly repaired until 8/29/2024, and no additional remedial excavation has taken place since 8/29/2024 when additional soil was removed during flowline repair work. The landowner has requested KPK remediate impacts to soil and groundwater ASAP. In an email correspondence KPK personnel stated: "Your site (we call it "Facility 3 @ Rasmussen") is a top priority. Right now, there is no digging at your site because we are having contractual issues with the landfills, so we cannot dispose of waste at the moment. I suspect those issues may be resolved in the next 2 weeks but I don't know for sure."**

Additional soil has been removed since ECMC received this complaint; however, impacts remain in situ and no crews were present on location at the time of inspection.

Corrective Action:

Date:

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

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Spill is located within a CPW mapped high priority habitat for bald eagle roost. Compliance with Rule 912.b.(10) was required by August 24, 2024. Per Rule 912.b.(10) at the same time the Operator submits a Form 19i Operator's are required to provide written and/or verbal notification to CPW if the Spill or Release occurred within 300 feet of surface Waters of the State or within a mapped high priority habitat. Operator has not indicated CPW has been notified. ECMC has attached the relevant email correspondence between CPW and KPK received to date.

Corrective Action: CA on FIR Doc # stated: "Operator shall notify CPW immediately and provide the correspondence on the subsequent Supplemental Form 19 [CA due date 9/10/2024]. Operator did not notify CPW until September 20th, 2024.

Date: _____

Reportable: YES 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)	
Oily Soil					
Comment	Visibly impacted soils remain in-situ in the open excavation and free product present on groundwater within the open excavation.				
Corrective Action	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 or Form 27 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.			Date:	

Spill/Remediation:

Comment: Soil has been removed and the failed segment of the flowline exposed and repaired prior to this inspection. Stained soils remain in-situ and free product was observed on groundwater within the open excavation.

Corrective Action: 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.

Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment Per Rule 1003, all disturbed areas affected by drilling or subsequent operations shall be reclaimed.
Vehicle rutting from initial spill response activities was observed in the grassy area adjacent to Preserve Drive.

Corrective Action Operator shall comply with Rule 1003 to repair all rutting and reseed as soon as environmental conditions will permit using a seed mixture requested by the surface owner or a mixture prescribed by the local county NRCS. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Ensure erosion controls are implemented to stabilize the seeded soil. Operator shall continue to monitor and manage this site until the location meets Rule 1003 standards, including weed management.

Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment:

Corrective Action:

Date _____

Overall Final Reclamation _____

Well Release on Active Location

Multi-Well Location

ECMC Comments

Comment	User	Date
CORRECTIVE ACTIONS REQUIRED ON FIR DOC #710100245 ARE PAST DUE	andersoln	09/25/2024

Attached Documents

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

Document Num	Description	URL
403934161	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6720714
710100269	2024_0923_Facility 3 @ Rasmussen Photo Documentation	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6720704
710100270	KPK - CPW Email Correspondence Regarding Spill Notification in HPH	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6720705
710100271	2024_0923_RE CPW- FIR Doc #710100245 Submitted Notice	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6720706