

**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:

01/22/2025

Submitted Date:

01/22/2025

Document Number:

717100072**FIELD INSPECTION FORM**Loc ID 332971 Inspector Name: Rollins, Grace On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC 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:11 Number of Comments5 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
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
480738	SPILL OR RELEASE	CL	06/01/2022		-	Hladky-O'Gorman Header	EI

General Comment:

ECMC Environmental Field Inspection Report Summary

Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. Photos attached to document site conditions.

On January 22, 2025 KP Kauffman (Operator) informed ECMC staff that a crew would be on location to complete remedial activities associated with Spill ID 480738/Remediation Project # 23306. A truck-mounted rig and Operator personnel were on location at the time of ECMC staff arrival. Operator personnel informed ECMC staff that the crew and equipment were on location for the plugging and abandonment of the Hladky-O'Gorman 3 well (API #: 05-123-07775) and were not conducting environmental work. Operator personnel also informed ECMC staff that personnel and equipment had been on location to conduct environmental excavation activities the previous day, January 21, 2025.

Spill ID: 480738

Spill Name: Hladky-O'Gorman Header

Remediation Project #: 23306

Facility ID: 480225

Well Name: Hladky-O'Gorman 3

Well API #: 05-123-07775

Reported Date of Discovery: 09/09/2021

Days Since Spill Discovery: 1,231 (as of 01/22/2025)

Last Report: 07/18/2024 (Form 27 Doc. # 403848507)

Date of Inspection: 01/22/2025

Spill is located within or adjacent to:

- Occupied buildings
- Crop field

Current site status:

- Orange construction fencing and metal fencing partially surround the excavation area but do not fully encompass the excavations.
- Orange construction fencing is not secured and was observed blowing in the wind.
- Multiple unmarked soil stockpiles were observed on location, none of which have BMPs installed.
- The excavation noted in the previous Field Inspection Report (Doc. # 697602451) remains open with a segment of flowline exposed.
- Multiple trenches have been excavated.
- Soil with gray staining was observed in-situ and in contact with frozen groundwater within portions of the trenches/excavations.
- Torn pieces of liner and segments of pipes/lines are visible within the trenches.
- Two monitoring wells were observed adjacent to the trenches/excavations.
- Wildlife tracks were visible surrounding and within the open excavations.
- Weeds have grown on some soil stockpiles and within the excavation present at the time of the previous Field Inspection Report (Doc. # 697602451).
- Trash (pieces of liner and discarded orange construction fencing) was observed on location.
- Operator personnel, rig, ancillary equipment, and water/cement containers were on location for the plugging and abandonment of the Hladky-O'Gorman 3 well.

See attached corrective actions. A Supplemental Form 27 is required.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	TRASH		
Comment:	Trash (pieces of liner and discarded orange construction fencing) was observed on location.		
Corrective Action:	Comply with Rule 606.		Date: 01/29/2025
Type	WEEDS		
Comment:	Weeds have grown on some soil stockpiles and within the excavation areas.		
Corrective Action:	Comply with Rule 606.		Date: 01/29/2025

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type	OTHER		
Comment:	Orange construction fencing and metal fencing partially surround the excavation area but do not fully encompass the excavations. Orange construction fencing is not secured and was observed blowing in the wind. Wildlife tracks were visible surrounding and within the open excavations.		
Corrective Action:	The operator is to maintain best management practices to control and contain all spills/releases of E&P waste to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended.		Date: 02/05/2025

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Location Construction

Location ID: 480738 CDP: _____

Comment: _____

Corrective Action: _____

Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____

Date: _____

Wildlife BMPs:

Comment: Wildlife tracks were visible surrounding and within the open excavations.

Corrective Action: _____

Date: _____

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:	480738	Type:	SPILL OR	API Number:	-	Status:	CL	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Remediation Project No. 23306 was created for the remediation of Spill ID 480738 at the Hladky-O'Gorman Header location. The excavation noted in the previous Field Inspection Report (Doc. # 697602451) remains open with a segment of flowline exposed. Multiple trenches have been excavated. Soil with gray staining was observed in-situ and in contact with frozen groundwater within portions of the trenches/excavations. Torn pieces of liner and segments of pipes/lines are visible within the trenches. Two monitoring wells were observed adjacent to the trenches/excavations. Weeds have grown within the excavation present at the time of the previous Field Inspection Report. Wildlife tracks were visible surrounding and within the open excavations. Quarterly reporting was required under Remediation Project No. 23306; the last Form 27 for this project was submitted 07/18/2024 (Document No. 403848507).

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered. In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (90 days). Operator shall provide an updated Form 27 for Remediation Project No. 23306.

Date: 02/05/2025

Reportable: _____ 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: _____

Spill/Remediation:

Comment: Multiple unmarked soil stockpiles were observed on location, none of which have BMPs installed. Weeds have grown on some soil stockpiles.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C.

Date: 02/05/2025

Emission Control Burner (ECB): _____

Comment: _____

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

ECMC Comments

Comment	User	Date
This Spill was discovered 1,231 days ago (as of 01/22/2025). Although some additional remedial work has been conducted since the previous Field Inspection Report (Doc. # 697602451), the remediation efforts to date remain inadequate.	rollinsg	01/22/2025

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

Document Num	Description	URL
717100073	ECMC Photo Log - Hladky-O'Gorman Header	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6886088