

**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:

01/23/2025

Document Number:

717100074

FIELD INSPECTION FORM

Loc ID 317719 Inspector Name: Rollins, Grace 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:

- 6 Number of Comments
- 2 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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
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,		cogcc@kpk.com	All Inspections
Brown, Kari		kari.oakman@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Watzman, Ross		rwatzman@kpk.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
317719	LOCATION	AC			-	HAZEL MCHALE-62N67W 26SWSE	EI

General Comment:

This is a follow-up Field Inspection Report to provide the laboratory analytical data from the samples described in Field Inspection Report Document No. 717100032. Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable.

On January 6, 2025, EMC received a complaint from the friend of a landowner (Form 18 Document Number 404048198). The complaint noted that on January 2, 2025, apparent hydrocarbon fluids were observed leaking from the separator. The posted Emergency Contact Number (303)825-4822 was called to notify KP Kauffman (Operator) of the leak. The complaint reports that the Operator appeared to have repaired the leaking equipment but addressed neither the contamination nor the lack of adequate fencing in the presence of livestock.

On January 10, 2025, while onsite ECMC collected three soil samples, one of which (SS-01@0-6") was submitted for laboratory analysis. PIDs ranged from 48.7 in SS-03@0-6" to 4408 ppm in SS-01@0-6". Samples were collected adjacent to the separator from visibly impacted soil beneath the thin layer of newly placed fill material. The samples were packed in laboratory provided jars using standard environmental practices and immediately placed on ice and submitted under standard chain of custody for laboratory analysis of Table 915-1 organic compounds in soil, Table 915-1 soil suitability for reclamation parameters, and Table 915-1 metals.

The Laboratory Analytical Report and Analytical Summary Table for the ECMC soil sample are attached to this Inspection Report. Results indicate the concentrations of Total Petroleum Hydrocarbons (43630 mg/kg) and multiple organic and metals contaminants of concern exceeded their respective Table 915-1 regulatory limits.

Soils within the spill area are comprised of sandy silt with gravel; therefore, vertical migration is suspected. Based on soil lithology ECMC estimates the spill volume to be between 1.04 and 2.59 bbls. Conservative Table 900-3 conversion estimates the spill between 0.48 and 1.20 barrels, which is reportable in accordance with Rule 912.b.1.B. Based on the pooled petroleum hydrocarbons visible in the photos provided with the complaint, the spill is suspected to have migrated to the subsurface and is therefore not fully contained within a liner.

An Initial Form 19 is required based on the pictures attached to the initial complaint, the estimated spill volume, impacts presumed to remain in situ, laboratory analytical results, and visual, olfactory, and screening field observations.

See attached corrective actions. ECMC has not received a Form 19 Initial to date (as of 01/23/2025).

Inspected Facilities

Facility ID: 317719 Type: LOCATION API Number: - Status: AC Insp. Status: EI

Complaint

Comment: Description from complaint (Form 18 Document Number 404048198): On Thursday, 1/2/25, the landowner noticed a significant amount of oil coming out of a broken sight glass of the separator. He called me for help on this matter, so I directed him to call the emergency number on the facility sign. A crew showed up shortly to fix the sight glass, but the ground contamination was not thoroughly addressed. His cattle came around during the process, so the landowner also asked them to fix their fence barrier around the facility, but this has not been taken care of properly either, so a lot of time is spent now keeping the cattle out and away from the equipment. He will most likely stretch wire himself to fix this problem if it does not raise concern with KP Kauffman.

Corrective Action: Repair fencing to comply with Rule 1002.
 Properly dispose of oily waste in accordance with 905.e and report in accordance with 912.
 CA backdated to 24 hours following ECMC's receipt of complaint in which notification to the Operator was reported (Form 18 Document Number 404048198). As of 01/23/2025, neither an Initial Form 19 nor a Field Inspection Report Resolution have been received.

Date: 01/03/2025

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

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Pictures showing apparent pooled petroleum hydrocarbon fluids were included in a complaint (Form 18 Document Number 404048198) received by ECMC on 01/02/2025. While onsite, ECMC observed stained soil with a strong petroleum hydrocarbon odor (roughly ~7' x ~6') in situ in the area surrounding the southern portion of the horizontal separator. The stained soil has been covered with a thin layer of dirt/fill material.

Corrective Action: Properly dispose of oily waste in accordance with 905.e and report in accordance with 912. CA backdated to 24 hours following the date of discovery as notification to the Operator was reported (Form 18 Document Number 404048198). As of 01/23/2025, an Initial Form 19 has not been submitted. Date: 01/03/2025

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: Other Comment: Separator Spill

Sample	Sample Type: <u>SOIL GRAB</u>		
Time: <u>01/10/2025 13:00</u> (MM/dd/yyyy hh:mm)	GPS: Lat <u>40.103730</u>	Long <u>-104.855110</u>	
BTEX: _____	TPH: _____	Anion: _____	Captions: _____ General Chemistry: _____
Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____	8260: _____
8270: _____	RCRA Metals: _____	910-Metals: _____	PAH: _____
Other: <u>Full Table 915-1</u>			
Comment:	The Laboratory Analytical Report and Analytical Summary Table for the ECMC soil sample are attached to this Inspection Report.		

Lab:

Lab Name _____
 Pace Analytical _____

Attached Documents

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

Document Num	Description	URL
404068295	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6887763
717100075	ECMC Soil Sampling Laboratory Analytical Report - Hazel McHale 1	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6887744
717100076	ECMC Soil Sampling Analytical Summary Table - Hazel McHale 1	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6887745