

**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:

03/19/2025

Submitted Date:

04/09/2025

Document Number:

710100382

FIELD INSPECTION FORMLoc ID 318207 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 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

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
Brown, Kari		kari.oakman@state.co.us	
Rollins, Grace		grace.rollins@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
MacLaren, Joe		joe.maclaren@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	PA
318207	LOCATION	AC			-	DITLEV-SIMONSEN C-62N67W 31NESW	EI
479608	Flowline System	AC	02/19/2025		-	Facility 4 Consolidation	EI
485898	SPILL OR RELEASE	CL	05/09/2024		-	Facility 4 @ Ditlev C1	EI

General Comment:

This is a combined Environmental inspection conducted on March 19 and April 8, 2025, by ECMC Environmental Protection Specialists, Laurel Anderson and Grace Rollins (4/8/25 only), to document ongoing site investigation and remediation activities at the following KP Kauffman facilities/projects:

Facility 4 @ Ditlev C1 Spill ID No: 485898
-Reported Spill Date of Discovery: 1/17/2024
-Remediation Project #34670
-Last approved Form 27 received: 10/14/2024
Facility ID No: 479608 (Facility 4 Consolidation)
DITLEV-SIMONSEN C1 Well API: 05-123-08660
DITLEV-SIMONSEN C-62N67W31NESW Location ID 318207
-Remediation Project #39029
-Last approved Form 27 received: 2/18/2025

Any corrective actions from previous inspections/enforcement actions, 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 on 3/19/2025.
Crews were on location removing flowlines at the time of inspection on 4/8/2025 (see photo 13).

Photos attached to document site conditions.
Note: Immediate corrective action is required

On 3/19/2025 ECMC observed a potential metallic sheen on groundwater within the northernmost flowline trench at the northern 90 degree elbow. At the time ECMC was unable to determine if it was due to oil and gas activities (see photo 1).

On 4/8/2025 ECMC returned to determine site progress and inspect exposed groundwater within the northernmost flowline trench at the northern 90 degree elbow (see photos 2 & 3). ECMC again observed the presence of the metallic sheen on groundwater and observed gross free product on groundwater within the open flowline trench at the southern 90 degree elbow (see photo 2).

Based on this observation, groundwater is impacted. Operator shall submit an Initial Form 19 for this spill in accordance with Rule 912.b. (1)F.

Ongoing issues:

-See Corrective Actions regarding inadequate fencing on Field Inspection Report Doc Nos: 710100133, 697602260, 710100167, 710100190, and 710100192.
Compliance with Rule 913.b.(5)B.i. and ECMC Guidance 913.b.(5)B.i.-v. was first required by February 5, 2024. ECMC has observed the Operator out of compliance with Rule 913.b.(5)B.i. and this corrective action on February 29th, March 1st, April 3rd and 22nd, 2024 and again on March 19th (see photos 4 & 5) and April 8th (see photos 2, 3, 6 & 7), 2025.

-See Corrective Actions regarding waste management on Field Inspection Report Doc Nos: 710100133, 697602260, 710100167, 710100190 and 710100192.
Compliance with Rule 905 was required via corrective action on FIR Doc # 710100133 submitted on February 5, 2024.
ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024, and on March 19th and April 8th, 2025.

-Orange construction fencing surrounding open excavations/trenches is torn/fallen and inadequate, no caution/warning signage present
3/19/2025 - see photos 4 & 5
4/8/2025 – see photos 2, 3, 6 & 13

-Multiple soil stockpiles were observed on location without signage/BMPs
3/19/2025 - see photos 4 & 5
4/8/2025 – see photos 3, 6 & 7

-Stained soil was observed within the open excavation for Facility 4 @ Ditlev C1 Spill ID No 485898 beneath the uncapped flowlines visible with open excavation on 3/1/2025
3/19/2025 - see photo 8
4/8/2025 – see photo 9

-Pieces of E&P waste stockpile liner were observed throughout the location
3/19/2025 - see photo 10
4/8/2025 – see photos 11 & 12

Spills are located within the Town of Frederick and within 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 ft from Centennial Park, approximately 350 ft from a pond, approximately 700 ft from a mapped wetland (freshwater emergent), approximately 500 ft from soccer fields, 800 ft from baseball fields, and approximately 1,200 ft from dense suburban development.

Location				
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:		<div>No signage or emergency contact information posted.</div>		
Corrective Action:		<div></div>		Date: <div></div>
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment:		<div></div>		
<input type="checkbox"/> Multiple Spills and Releases?				
Fencing/:				
Type	OTHER			
Comment:	<div>See Corrective Actions regarding inadequate fencing on Field Inspection Report Doc Nos: 710100133, 697602260, 710100167, 710100190, and 710100192. Compliance with Rule 913.b.(5)B.i. and ECMC Guidance 913.b.(5)B.i.-v. was first required by February 5, 2024. ECMC has observed the Operator out of compliance with Rule 913.b.(5)B.i. and this corrective action on February 29th, March 1st, April 3rd and 22nd, 2024 and again on March 19th (see photos and April 8th, 2025.</div>			
Corrective Action:	<div></div>			Date: <div></div>
Venting:				
Yes/No				
Comment:	<div></div>			
Corrective Action:	<div></div>			Date: <div></div>
Flaring:				
Type	<div></div>			
Comment:	<div></div>			
Corrective Action:	<div></div>			Date: <div></div>

Inspected Facilities									
Facility ID:	240872	Type:	WELL	API Number:	123-08660	Status:	PR	Insp. Status:	PA
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	318207	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	EI
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:	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: On 3/19/2025 ECMC observed a potential metallic sheen on groundwater within the northernmost flowline trench at the northern 90 degree elbow. At the time ECMC was unable to determine if it was due to oil and gas activities (see photo 1). On 4/8/2025 ECMC returned to determine site progress and inspect exposed groundwater within the northernmost flowline trench at the northern 90 degree elbow (see photos 2 & 3). ECMC again observed the presence of the metallic sheen on groundwater and observed gross free product on groundwater within the open flowline trench at the southern 90 degree elbow (see photo 2).

Corrective Action: Based on this observation, groundwater is impacted. Operator shall submit an Initial Form 19 for this spill in accordance with Rule 912.b.(1)F.

Date: 04/09/2025

Reportable: YES

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type Management Condition GPS (Lat) (Long)

Oily Soil Piles Inadequate _____

Comment: -See Corrective Actions regarding waste management on Field Inspection Report Doc Nos: 710100133, 697602260, 710100167, 710100190 and 710100192. Compliance with Rule 905 was required via corrective action on FIR Doc # 710100133 submitted on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024, and on March 19th and April 8th, 2025.

Corrective Action

Date:

Spill/Remediation:

Comment: Facility 4 @ Ditlev C1 Spill ID No: 485898 was discovered on 1/17/2024. Site investigation and remediation is being reported under Remediation Project #34670. The last approved Form 27 Supplemental (Doc #403843091) was received 10/14/2024. Based on the analytical data attached to Doc #403843091 impacts to soil remain in situ and additional remediation is required. Oil stained soil was observed within the open excavation and the previously repaired section of flowline was partially removed and remains uncapped with open excavation (See Photos 4-6). Gray stained soil was observed at ~4-5' bgs along the southern sidewall of the excavation. Data attached to Form 27 Supplemental (Doc #403843091) indicated organic and inorganic impacts to soil were reported SE outside of the excavation extent at BH-01 @ 5-10'.

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule (every 90 days).

Date: 01/12/2025

Operator is 80 days past due on quarterly reporting as of April 2, 2025. CA due date backdated to when the last quarterly Supplemental Form 27 was due.

Emission Control Burner (ECB): _____

Comment: _____

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

ECMC Comments

Comment	User	Date
3/19/2025 Weather conditions at time of inspection: Partly cloudy, windy (~25 mph winds from N/NE), 30 F PPE: Level D + FR	andersoln	04/02/2025
4/8/2025 Weather conditions at the time of inspection: Partly cloudy, calm winds (~10 mph winds from S/SSW), 50 F PPE: Level D + FR		

Attached Documents

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

Document Num	Description	URL
404159776	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6997710
710100389	2025_0319 & 0408_Facility 4 @ Ditlev C1 Spill & Ditlev C1 Decom Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6997692