

**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:

01/23/2024

Submitted Date:

03/04/2024

Document Number:

710100156**FIELD INSPECTION FORM**Loc ID 318264 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC 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:8 Number of Comments2 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
Haake, Ron		ronandmargie@yahoo.com	Landowner
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Graber, Nikki		nikki.graber@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159787	LOCATION	AC			-	Facility 5	EI
241003	WELL	PR	10/01/2023	OW	123-08791	MCCANNON UNIT 2	EI
478836	Flowline System	AC			-	Facility 5	EI

General Comment:

This is an environmental inspection in response to a complaint (Doc #403563168) - ECMC EPS observed visibly distressed vegetation south of the KP Kauffman's McCannon Unit 2 wellhead (API 123-08791) and associated McCannon Unit 2 flowline (Facility ID #159787) and Donald E Miller Consolidation line (Facility ID #478836). Any corrective actions from previous inspections that have not been addressed are still applicable. No operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

On January 23, 2024 at approximately 11:00 am ECMC Environmental Protection Specialists, Laurel Anderson and Alex Ahmadian, met with the landowner, performed an environmental inspection and collected soil samples from areas where surficial soils were visibly discolored and crops had been distressed during the previous growing season.

SB-01 – was hand augered to refusal at ~2.5' bgs Soil consisted of medium brown silty clays from 0-2' bgs and light gray clayey silt from 2'-2.5'. Soils were field screened using a photoionization detector (PID). PID readings ranged from 0.0 to 0.1 parts per million (ppm).

Location: (40.07761,-104.89325)

SB-02 – was hand augered to refusal at ~2.5' bgs Soil consisted of medium brown silty clays from 0-2' bgs and light gray clayey silt from 2'-2.5'. Soils were field screened using a PID. PID readings ranged from 0.0 to 0.3 ppm

Location: (40.07763,-104.89327)

SB-03 – was obtained via shovel from 0-6" bgs. Soil consisted of medium brown silty clay. The soil was field screened using a PID – the PID reading was 0.1 ppm.

Location: (40.077623, -104.893287)

Soil collected from SB-02 between 2' and 2.5' bgs (SB-02@2') and SB-03 between the surface and 6" bgs (SB-3@6") 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. SB-02@2 was submitted for laboratory analysis of all Table 915-1 contaminants of concern in soil while SB-03@6" was submitted for laboratory analysis of Table 915-1 soil suitability parameters only. No organic contaminants of concern were detected in SB-02@2', metals (with the exception of arsenic) were reported below Table 915-1 residential soil screening levels, and soil suitability parameters in both samples were below Table 915-1 allowable levels. The concentration of arsenic reported in SB-02@2' while above Table 915-1 residential soil screening levels is consistent with the range of background arsenic concentrations in the area. Laboratory chain of custody and soil sample analytical reports are attached.

In response to a complaint (Doc #403563168), ECMC staff performed multiple ECMC field inspections (Doc Nos: 714200184, 694100210 and 710100156), obtained FLIR video (Doc No. 714200185), collected soil samples for laboratory analysis (Doc No. 710100158) and requested and reviewed a site investigation from the Operator (See Form 27i Doc No. 403644419) in response to the complaint. Based on a review of this information, ECMC environmental staff has concluded the source of the distressed vegetation does not appear to be associated with known, active oil and gas exploration and production activity in the area and it appears that no further site investigation is necessary at this time. However, should future conditions in the area of distressed vegetation indicate E&P infrastructure/activities remain in situ and/or have resulted in contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.

Location				
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:		<div>Emergency contact number present and legible at wellhead.</div>		
Corrective Action:		<div></div>		Date: <div></div>
Good Housekeeping:				
Type	WEEDS			
Comment:		<div>Weeds present at wellhead and along access road.</div>		
Corrective Action:		<div>Comply with Rules 606.c. and 1003.f.</div>		Date: <div>03/18/2024</div>
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment:		<div></div>		
<input type="checkbox"/> Multiple Spills and Releases?				
Venting:				
Yes/No				
Comment:				
Corrective Action:				Date: <div></div>
Flaring:				
Type				
Comment:				
Corrective Action:				Date: <div></div>

Inspected Facilities									
Facility ID:	<u>159787</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>	
Facility ID:	<u>241003</u>	Type:	<u>WELL</u>	API Number:	<u>123-08791</u>	Status:	<u>PR</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>478836</u>	Type:	<u>Flowline</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>

Environmental

Spill/Remediation:

Comment:

Form 27 Initial (Doc #403644419) for Remediation Project #33565 included the following COA: "Operator shall submit a Form 27 Supplemental Requesting Closure and providing a map of the correct flowline alignment and reference the Form 44 Realignment Document Number that provides accurate mapping for this flowline.". Quarterly reporting is required for Remediation Project #33565.

Corrective Action:

Submit a Supplemental Form 27 addressing any outstanding conditions of approval by April 3, 2024.

Date: 04/03/2024

Emission Control Burner (ECB):

Comment:

Pilot: Wildlife Protection Devices (fired vessels):

Attached Documents

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

Document Num	Description	URL
403707711	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6453394
710100158	Soil Sample Laboratory Analytical Report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6453391
710100159	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6453392