

**FORM
INSP**Rev
X/15**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:

09/12/2019

Submitted Date:

09/12/2019

Document Number:

693501388**FIELD INSPECTION FORM**Loc ID 320419 Inspector Name: Silver, Randy On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1675 BROADWAY, STE 2800City: DENVER State: CO Zip: 80202**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:17 Number of Comments6 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
,		dnr_cogccenforcement@state.co.us	
Lara-Mesa, Susana	303-825-4822	cogcc@kpk.com	All inspections
Pesicka, Conor		conor.pesicka@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Gomez, Jason		jason.gomez@state.co.us	
,		dnr_cogccengineering@state.co.us	
Pesicka, Conor		conor.pesicka@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
203716	WELL	PR	10/01/2018	GW	001-09276	MCELWAIN 12-17	SI

General Comment:

Location

Lease Road:			
Type	Access		
comment:	Access road to location has deep ruts and is carrying sediment off road and into drainage.		
Corrective Action	Install or repair required BMPs per Rule 1002.f.	Date:	

Overall Good: ☐

Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	Adequate		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Adequate		
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Adequate		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		
Corrective Action:		Date: _____

Good Housekeeping:			
Type	DEBRIS		
Comment:	Stump and dead weeds between access road to well site and TNK BTRY.		
Corrective Action:	Comply with rule 603f	Date:	
Type	OTHER		
Comment:	Self-inspection, maintenance and good house keeping procedures and schedules.		
Corrective Action:	Comply with COGCC rule 1002 F (2) D Provide COGCC with pocedure and maintenance documentation within 48hrs	Date:	
Type	OTHER		
Comment:	Stained soil under piping outside of separator house		
Corrective Action:	Properly treat or dispose of oily waste in accordance with 907.e.	Date:	

Overall Good: ☐

Spills:				
Type	Area	Volume		
In Containment:	No			
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				

Fencing/:			
Type	SEPARATOR		

Comment:	Barb wire		
Corrective Action:		Date:	
Type	TANK BATTERY		
Comment:	Barb wire		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	None		
Corrective Action:		Date:	

Equipment:

			corrective date
Type: Gas Meter Run	# 2		
Comment:			
Corrective Action:		Date:	
Type: Emission Control Device	# 1		
Comment:			
Corrective Action:		Date:	
Type: Bradenhead	# 1		
Comment:	Appears to be plumbed to surface		
Corrective Action:		Date:	
Type: Plunger Lift	# 1		
Comment:			
Corrective Action:		Date:	
Type: Bird Protectors	# 2		
Comment:			
Corrective Action:		Date:	
Type: Horizontal Heated Separator	# 1		
Comment:			
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	100 BBLS	FIBERGLASS AST		,
Comment:					
Corrective Action:					Date:

Paint

Condition	Adequate	
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

Comment:		shares containment with crude oil tank.					
Corrective Action:						Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS		
CRUDE OIL	1	300 BBLS	STEEL AST		,		
Comment:							
Corrective Action:						Date:	

Paint

Condition	Adequate						
Other (Content)							
Other (Capacity)							
Other (Type)							

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance			
Earth	Adequate	Walls Sufficent	Base Sufficent	Adequate			
Comment:							
Corrective Action:						Date:	

Venting:

Yes/No	YES		
Comment:	Gas being vented or flared during non-upset condition without prior approval from COGCC. Gas being vented through sepatator exhaust stack.		
Corrective Action:	Contact the COGCC Area Engineer for next steps per Rule 912.b. Refer to the venting and flaring NTO for further details.		Date:

Flaring:

Type			
Comment:			
Corrective Action:			Date:

Inspected Facilities									
Facility ID:	203716	Type:	WELL	API Number:	001-09276	Status:	PR	Insp. Status:	SI
Idle Well									
Purpose: <input checked="" type="checkbox"/> Shut In <input type="checkbox"/> Temporarily Abandoned Reminder: EQUIPMENT ONSITE									
Comment: SI									
Corrective Action: Date:									

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Other						

Comment: Storm water from access road running down through location and sediment being carrioff location.

Corrective Action: Install or repair required BMPs per Rule 1002.f.

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

Optical Gas Imaging SurveySurvey Type: RoutineCurrent Operations: ☒ Production ☐ Workover ☐ Flowback ☐ Referred to APCD

GPS(entrance of location): Lat: _____ Long: _____

Wind: _____ Speed: _____ (mph) Direction From: sw Weather: Clear Temperature: 64 (F)

Assisting Staff: _____ Camera #: _____

☐ Visible Smoke ☐ Referred to CDPHE

Times Surveyed

Equipment Surveyed

Time Survey Start AM/PM Time Survey End AM/PM

Equipment

Separation Equipment

Comment: _____

Corrective Action: _____

Date:

COGCC Comments

Comment

User

Date

COGCC Inspection Report Summary

On Thursday September 12, 2019 at approximately 11:14, I, Inspector Randy Silver conducted an on-site inspection at a KP Kauffman site McElwain 12-17, at API# 05-001-09279 in Adams County Colorado.

While there, I observed a well site and production battery

During this inspection the following possible compliance issues were observed:

Venting: Rule 912 b See Video

Debris: Rule 603 f See photo 14

Stained soil: Rule 907 e See photo 13

Storm water: Rule 1002 f See photos 2,4,5,6,7,8

Self-inspection: Rule 1002 F (2) D

Weather conditions: Clear and location is dry.

At time of in section I observed a KPK separator that had the fuel gas line closed (see pics). It appears the burner is not lit on separator. The supply gas line to the burner appears to have 19 pounds on it. It appears gas is venting through the separator exhaust stack (see Flir video). I also observe erosion issues on access road and location. Debris on tank battery location.

After an internal review of recent inspections at KPK facilities, COGCC Staff has determined that KPK has repeatedly and consistently failed to comply with certain COGCC rules (categorized in those inspection reports as violations related to "Signs/Marker," "Emergency Contact Number," and/or "Good Housekeeping"). In light of this apparent pattern of violations, violation(s) identified in this inspection report under those categories are being entered for notification and documentation only and are not intended to provide KPK the potential opportunity to resolve the alleged violation(s) without the imposition of penalty, pursuant to Rule 522.c. Therefore, in this inspection report, COGCC Staff has documented violation(s) and identified relevant corrective action(s) required to return to compliance, and pursuant to Rule 522.c., retains discretion to seek penalties for any violation documented in this inspection report.

I spoke with KPK Supervisor Mani Silva at 11:35 AM and informed him of the separator venting and he stated he would send someone out to look at it.

At approx 11:45 KPK pumper arrived on site and stated burner was not lit on separator. He was going to light burner to try to resolve problem.

A follow up on this site inspection needs to be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

This is a summary of inspection report.

silverr

09/12/2019

Attached Documents

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

Document Num	Description	URL
402174529	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4935582
693501389	loc pic	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4935579
693501390	Flir video	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4935580