

**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:

02/29/2024

Submitted Date:

03/11/2024

Document Number:

710100170**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Anderson, Laurel 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 Comments3 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
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Graber, Nikki		nikki.graber@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479608	Flowline System	AC	03/12/2021		-	Facility 4 Consolidation	EI
485940	SPILL OR RELEASE	AC			-	Facility 4 @ UPRR 43 PAN AM AE	EI

General Comment:

Combined Environmental inspections conducted February 29th and March 1st, 2024, by ECMC Environmental Protection Specialists Laurel Anderson and Kari Brown, to witness soil sampling and document ongoing remediation activities associated with Spill ID 485940 (Facility 4 @ UPRR 43 PAN AM AE).

Any corrective actions from previous inspections that have not been addressed are still applicable. Any comments/conditions of approval from previously denied/approved forms that have not been addressed are still applicable.

Operator personnel were on location at the time of the 2/29/2024 inspection. No identifiable changes were made between the 2/29/2024 and 3/1/2024 inspections. Photos attached to document site conditions.

Spill is located:

Within the Town of Frederick

~60 feet from a residence within a dense suburban development

~60 feet from Ridgway Blvd.

~700 feet from UPRR 42 PAN AM AE #2 (Spill ID 480251)

~375 feet from Facility 4 AE 2 (Spill ID 481730)

-Orange construction fencing has been installed around the ~20'x14'x9' (LxWxD) open excavation

-No warning signage/Operator contact information is present at the open excavation

-No fencing or warning signage has been installed around contaminated soil stockpile

-Reportedly clean fill has been stockpiled on location north of the open excavation without BMPs

-Contaminated previously stockpiled without BMPs was exposed to snowmelt and spread/ further tracked outside of the immediate work area (including near 'clean' soil is being stored). The former contaminated soil stockpile has been removed/moved. Contaminated soil is currently being stockpiled NW of the open excavation on a liner with berms.

-Groundwater has begun to infiltrate the base of the excavation

-Visibly impacted soil were observed within the open excavation

-Utility line within the open excavation has been cracked

-Visible oil along eastern sidewall

-Elevated PIDs were documented on all sidewalls

-Additional excavation is needed

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	No signage present at open excavation/stockpiles.		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?

Fencing/:			
Type	OTHER		
Comment:	Remedial excavation and contaminated soil stockpile are located within the Town of Frederick, within a residential area. Orange construction fencing has been installed around the 20'x14'x9' (LxWxD) open excavation. The excavation has no shoring and limited sloping/benching. Contaminated soil stockpiled on location does not have fencing or signage.		
Corrective Action:	Operator shall implement, continuously monitor and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by Rule 913.b.(5)B.i and ECMC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc. when sites are not attended.	Date:	03/12/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	479608	Type:	Flowline	API Number:	-	Status:	AC	Insp. Status:	EI
Facility ID:	485940	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Comment	Reportedly clean fill has been stockpiled on location north of the open excavation without BMPs. Contaminated soil previously stockpiled without BMPs was exposed to snowmelt and spread/ further tracked outside of the immediate work area (including near where 'clean' soil is being stored). The former contaminated soil stockpile has been removed/moved. Contaminated soil is currently being stockpiled NW of the open excavation on a liner with berms and filter waffles; however, no signage is present. No fencing/warning signage has been installed around the contaminated soil stockpile.			
Corrective Action	Per CA on FIR Doc #710100141: "Operator is required to properly dispose of oily waste in accordance with 905.e. Operator shall attach all waste manifests to the next Supplemental Form 19 per Rule 905.b.(3)." Per CA on FIR Doc #697602263: "Unlined stockpiles with no signage were observed on location and need to be addressed." Compliance with Rule 905.e. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 12th, 2024 and gave the Operator 4 days to correct the issue (FIR Doc #697602263). ECMC observed the Operator remained out of compliance on February 29th and March 1st, 2024. CA due date back dated to CA due date on FIR Doc #697602263.			Date: <u>02/16/2023</u>

Spill/Remediation:

Comment:	Remedial excavation is remains open and fenced. Groundwater has begun to infiltrate the base of the open excavation. Visibly impacted soil remains insitu.			
Corrective Action:	Per CA on FIR Doc #710100141: "Operator shall immediately control and contain spills/releases and clean up per Rule 912.a." Per CA on FIR Doc #697602263: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered." CA due date back dated to CA due date on FIR Doc #697602263.			Date: <u>02/19/2023</u>

Emission Control Burner (ECB): _____

Comment: _____

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

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

Document Num	Description	URL
403714259	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6460879
710100171	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6460878