

**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:

03/12/2024

Submitted Date:

03/27/2024

Document Number:

697602295

FIELD INSPECTION FORMLoc ID 332971 Inspector Name: Ahmadian, Alexander On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC 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:

14 Number of Comments

10 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
Peterson, John		jpetersen@kpk.com	KPK environmental
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
, KPK		cogcc@kpk.com	All Inspections
Anderson, Laurel		laurel.anderson@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Watzman, Ross	303-825-4822	rwatzman@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
239987	WELL	SI	11/01/2021	OW	123-07775	HLADKY-O'GORMAN 3	EI
480225	TANK BATTERY	AC	06/24/2021		-	Hladky- OGorman&CaryWalking1	EI
480738	SPILL OR RELEASE	CL	06/01/2022		-	Hladky-O'Gorman Header	EI

General Comment:

This is an environmental inspection for Spill ID 480225 and 480738. Any corrective actions from previous inspections that have not been addressed are still applicable. Contract environmental personnel was on location at the time of this field inspection to perform quarterly groundwater monitoring. The landowner met me on location, and we discussed issues related to spill. Photos attached to document site conditions.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Signage is not visible at the separator due to the amount of weeds. No indication that signage exists. CA originally from inspection Document #697601979 and remains unaddressed.

Corrective Action: Install sign to comply with Rule 605.

Date: 01/13/2023

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds overgrown throughout the site. Separator is not visible due to the amount of weeds. CA originally from inspection Document #697601979 and remains unaddressed.		
Corrective Action:	Comply with Rule 606.	Date:	12/20/2022
Type	TRASH		
Comment:	Liner that was previously under an unmarked stockpile is torn in various places throughout the site. A monitoring well on site has no cap and the bailer and string is strung out across the location. Orange fencing around the wellhead excavation has been torn and is scattered throughout the location. CA originally from inspection Document #697602143 and remains unaddressed.		
Corrective Action:	Comply with Rule 606.	Date:	08/03/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type	OTHER		
Comment:	Fencing around the excavation of the wellhead has fallen. CA originally from inspection Document #697601979 and remains unaddressed.		
Corrective Action:	The operator is to maintain best management practices to control and contain all spills/releases of E&P waste to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended.	Date:	12/20/2022
Type	OTHER		
Comment:	Barbed wire fencing around bermed area of the tank battery was in disarray and falling all around the tank battery. CA originally from inspection Document #697602143 and remains unaddressed.		
Corrective Action:	The operator is to maintain best management practices to control and contain all spills/releases of E&P waste to protect the environment, public health, safety and welfare and the environment as required by rule 913.b(5)B.i which requires that Operators will fence or cover open remediation excavations to prevent access when sites are not attended.	Date:	06/28/2023

Equipment:

Type: Flow Line	#		corrective date
Comment:	Flowline within the excavation has been taped and is not properly capped. Historically abandoned and out of service flowlines are exposed in the excavation. CA originally from inspection Document #697602143 and remains unaddressed.		
Corrective Action:	These flowlines must be abandoned per Rule 1105 and cut ends must be sealed per 1105.e.4	Date:	08/03/2023

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
Comment:						
Corrective Action:					Date:	

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth		Walls Insufficient	Base Insufficient	Inadequate	
Comment:	Earthen berm surrounding the storage tanks and produced water tank is not adequate. Weeds have grown through the berm and has compromised the integrity of the berm. CA originally from inspection Document #697602143 and remains unaddressed.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.				Date: 08/15/2023

Venting:

Yes/No					
Comment:					
Corrective Action:				Date:	

Flaring:

Type				
Comment:				
Corrective Action:			Date:	

Inspected Facilities									
Facility ID:	<u>239987</u>	Type:	<u>WELL</u>	API Number:	<u>123-07775</u>	Status:	<u>SI</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>480225</u>	Type:	<u>TANK</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>480738</u>	Type:	<u>SPILL OR</u>	API Number:	<u>-</u>	Status:	<u>CL</u>	Insp. Status:	<u>EI</u>

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: The last Form 27 Supplemental Document #403207885 was submitted on 10/27/2022. Operator has not submitted a form within the approved quarterly reporting schedule and Rule 913.e.(3); the next quarterly report was due 1/25/2023.

Corrective Action: Operator shall immediately submit a Form 27 for Spill ID 480225 that includes a specific workplan and timeline to address the remaining impacts. Date: 01/25/2023

Reportable: _____ 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	Tanks	Inadequate		
Comment	Stockpile has been mostly washed away and stormwater BMPS surrounding the remaining stockpile are inadequate. The liner under the stockpile is still on location and is torn in various spots. No berm exists around the remaining stockpile. CA originally from inspection Document #697602143 and remains unaddressed.			
Corrective Action	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905.			Date: <u>08/03/2023</u>

Spill/Remediation:

Comment: Remediation excavation is still open and has not changed since the last inspection. Weeds are overgrown within the excavation due to the length of time that the excavation has been open. Excavation is surrounded by metal fencing which is adequate. CA originally from inspection Document #697601979 and remains unaddressed.

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered. Date: 12/20/2022

Emission Control Burner (ECB): _____

Comment:

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

COGCC Comments

Comment	User	Date
Overall site conditions are very poor as the site has been neglected. No remediation has been done since the last inspection. Immediate response is needed by the Operator.	ahmadiaa	03/27/2024

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

Document Num	Description	URL
403733205	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6483483
697602296	Photolog	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6483471