

**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:

03/21/2024

Submitted Date:

03/27/2024

Document Number:

710100180

**FIELD INSPECTION FORM**Loc ID \_\_\_\_\_ Inspector Name: \_\_\_\_\_ On-Site Inspection ☐  
Anderson, Laurel 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:**

13 Number of Comments

1 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
Peronard, Paul		Peronard.Paul@epa.gov	U.S. EPA Federal On-Scene Coordinator
Reyna, Andrea		andrea.reyna@state.co.us	EIT - Field Services Section (Field Unit 3)
Bowker, Taylor		Bowker.Taylor@epa.gov	U.S. EPA Federal On-Scene Coordinator
Peterson, John	303-550-8872	jpeterson@kpk.com	Director EHS & Compliance
Robinson, Taylor		taylor.robinson@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
MacLaren, Joe		joe.maclaren@state.co.us	
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.
Graber, Nikki		nikki.graber@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
478839	Flowline System	AC			-	Facility 8	EI
486343	SPILL OR RELEASE	AC			-	Facility 8 @ Sebold	EI

**General Comment:**

This is a combined ECMC environmental inspection for March 21st and March 22nd, 2024, in response to a spill (Incident Report #1394405) reported to the U.S. Environmental Protection Agency (EPA) National Response Center (NRC) on March 21, 2024, at 11:14am MT (NRC Incident Report #1394405). The Office of Emergency Preparedness and Response (OEPR) within the Colorado Department of Public Health and Environment (CDPHE) reiterated the information provided in the NRC Incident Report at 11:20am MT via the Colorado Environmental Spills or Releases Reporting Form.

The spill occurred along the Sebold Dorothy Consolidation Line. The Sebold Dorothy Consolidation Line is registered as an 8" steel segment of the Facility 8 Flowline System (Facility ID #478839).

On March 21, 2024, ECMC Environmental Protection Specialist (EPS), Laurel Anderson, arrived on location at 13:30. Upon arrival EPA Federal On-Scene Coordinator, Paul Peronard, and multiple KP Kauffman (KPK/Operator) personnel were on location. EPA and ECMC met with the landowner. ECMC EPS, Alex Ahmadian, arrived on location at approximately 13:35, at which point ECMC and EPA drove to the back of the property to inspect the spill.

Both the ECMC and EPA spoke with KPK crews who reported the spill was from an unknown flowline and they were unsure why the flowline appeared to be pressurized as the wells in the area were required to be shut in under a previous 901.a. order.

Oil stained soil and vegetation extend approximately 450' at the surface. The oil and produced water from the flowline travelled from where the spill surfaced to the southeast 50' along a low then travelled down the west bank of Brighton Ditch and into Brighton Ditch. Brighton Ditch was dry at the time of inspection and has not been turned on for the season. Once in Brighton Ditch fluids traveled north/north northeast approximately 400 feet. Animal prints were observed in oil stained soil within the ditch.

KPK crews had reportedly isolated the line and began vacuuming fluids from the line prior to ECMC arrival. An audible suction noise from the hole where the spill surface could be heard during the inspection. A strong hydrocarbon odor, pooled oil, stained soil, and vegetation were present where spill surfaced. Operator crews were on location removing visibly impacted soil from within Brighton Ditch, installing liners and berms to store impacted soil on.

ECMC Field Inspector, Adam Burns, arrived on location at approximately 14:30 to perform a drone flight. ECMC Integrity Inspector, Joe MacLaren, arrived on location at approximately 15:00 to perform an inspection.

At approximately 16:15, following EPA personnel on location's request, crews were began to re-expose the flowline where the spill surfaced (the excavation sidewalls reportedly collapsed). Upon re-exposure, ECMC observed the 8" steel Sebold Dorothy consolidation line had been cut previously and an unknown portion removed; a 3" HDPE line had been slip lined through the original 8" steel line. A hole was observed in the 3" HDPE line at the opening of the 8" line – the hole was presumed to be caused by the excavator while KPK attempted to expose the flowline. The root cause of the spill is unknown. Stained soil within and beneath the 8" line appeared dark gray in comparison to the dark brown oil stained soil above where the spilled fluids travelled along the surface.

ECMC and EPA personnel left the spill location, stopped to speak with a Colorado Parks and Wildlife representative who had just arrived and the landowner before leaving the property. The landowner indicated he discovered the spill earlier that day at approximately 11:00 am when he walked to the back of the property and heard an audible bubbling sound. The landowner provided ECMC video documentation of the spill (attached). ECMC, EPA and CPW personnel were off location at approximately 17:15.

See Inspector Comments for 3/22/2024 inspection summary.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type

TRASH

Comment:

Trash and debris onsite.

Corrective Action:

Operator shall comply with Rule 606.

Date: 04/03/2024

Overall Good: ☐**Spills:**

Type

Area

Volume

In Containment: No

Comment:

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

Type

OTHER

Comment:

Operator has installed orange construction fencing around the open excavation. Operator shall 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 ECOM 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.

Corrective Action:

Date:

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:

Date:

Inspected Facilities									
Facility ID:	478839	Type:	Flowline	API Number:	-	Status:	AC	Insp. Status:	EI
Facility ID:	486343	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI

**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Comment	Additionally, Operator shall manage waste in compliance with Rule 913.b.(5)B and ECMC Guidance 913.b.(5)B i.-v. and install BMPs in accordance with 1002.f.(2) to prevent runoff and completely contain impacts. Operator shall provide photo documentation of stockpile and frac tank liner integrity via Form 19 or Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil/water has spilled or been tracked outside of containment for complete Table 915-1 Contaminants of Concern.			
Corrective Action				Date: _____
Oily Soil	Piles	Adequate		
Comment	A frac tank and oily soil are being stockpiled on location on liners with earthen berm and filtrex wattles. Oil absorbent booms have been placed within Brighton Ditch and Big Dry Creek. Spill response and site investigation and remediation activities for this spill and previous spills by KPK have disturbed the majority of this parcel of land. Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts to the next Supplemental Form 19 per Rule 905.b.(3).			
Corrective Action				Date: _____

**Spill/Remediation:**

Comment:	On 3/21/2024 and 3/22/2024, ECMC observed hydrocarbon stained soils in-situ within Brighton Ditch and the open excavation where the spill surfaced. On 3/22/2024 ECMC observed free product on groundwater within an excavated portion of Brighton Ditch. Operator shall control and contain spills/releases and clean up per Rule 912.a. Per Rule 912.b.(4), the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered. The Supplemental Form 19 is due no later than March 31, 2024.	
Corrective Action:	_____	Date: _____

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**COGCC Comments**

Comment	User	Date
<p>On March 22nd, 2024, ECMC EPS, Laurel Anderson arrived on location at approximately 10:00. ECMC spoke with the landowner and KPK's Jeff Peterson upon arrival. The landowner expressed concerns regarding the area disturbed by the 3 Farms Consolidation Line Spill as it had not been reclaimed and water has pooled at the surface of the former excavation. The landowner also expressed concern regarding the drainages on his property and requested the areas where crushed asphalt was removed be regraded and crushed asphalt be reapplied.</p> <p>ECMC EPS, Taylor Robinson arrived on location at approximately 10:15. Multiple Operator personnel and subcontractor personnel were on location upon arrival. A drill rig that had arrived on location ahead of ECMC was attempting to auger down to groundwater in order to evaluate groundwater and install infrastructure to recover free product if needed; however, the equipment was not functioning properly and crews paused to evaluate alternative options. ECMC spoke with John Peterson with KPK. Mr. Peterson indicated KPK encountered free product on groundwater within Brighton Ditch last night and they were planning to evaluate the extent of impacts by installing multiple soil borings and monitoring wells. KPK planned to continue soil sampling and scraping impacted soil from the spill along Brighton Ditch. Mr. Peterson indicated he was unsure why the flowline was pressurized and root cause was unknown at this time, but the flowline had been isolated and depressurized. Mr. Peterson indicated they had a direct push rig scheduled for the following week to install soil borings. ECMC asked if KPK planned to install any borings between Brighton Ditch and Big Dry Creek. Mr. Peterson indicated access to the area was limited, but KPK would hand auger. Mr. Peterson indicated crews were installing booms along Big Dry Creek and would be collecting surface water samples from Big Dry Creek though none had been collected yet.</p> <p>ECMC performed an inspection along the ditch and spoke with Operator personnel performing sampling along the ditch. They indicated samples were being collected every 20' from where the spill entered the ditch down past the visible extent of the spill by approximately 100'. They also indicated surface water samples would be collected that day from four locations; One upstream of the spill, one roughly cross-gradient of where the spill surfaced, one roughly cross-gradient from where free product was observed on groundwater within Brighton Ditch and one further downstream. ECMC crossed Brighton Ditch and continued their inspection along the Brighton Ditch. Additional Operator personnel and crews arrived on location, but left prior to ECMC finishing their inspection along Brighton Ditch and Big Dry Creek.</p> <p>Photos attached to document conditions at the time of inspection.</p> <p>The spill extent within Brighton Ditch parallel's Big Dry Creek to the north. Visibly impacted soils are ~60' from Big Dry Creek in some areas.</p> <p>The spill extent:</p> <ul style="list-style-type: none"> <li>-Is within a mapped USFWS high priority habitat buffer for Aquatic Native Species Conservation Waters</li> <li>-Is within the buffer for NWI wetlands</li> <li>-Is within a 100-year floodplain</li> <li>-Is within Weld County, Colorado</li> <li>-Is ~60' from navigable water (Big Dry Creek)</li> <li>-Has impacted groundwater (free product observed on groundwater within Brighton Ditch)</li> <li>-Is within ¼ mile of two residential wells, two occupied structures, agricultural land, livestock, CR 8, and 5 separate spills/releases by this Operator (KPK).</li> <li>• Facility 8 Consolidation Line (Spill ID No. 469095)</li> <li>• Facility 8 Consolidated Gas Line (Spill ID No. 452596) - Location included in photos</li> <li>• 3 Farms Consolidation line (Spill ID No. 482598) - Location included in photos</li> <li>• E. Stieber Consolidation (Spill ID No. 480275) - Location included in photos</li> <li>• E. Stieber Consolidation (Spill ID No. 481906) - Location included in photos</li> </ul> <p>H. Huett Consolidation Release (Spill ID No. 478005) - Location has been included in photos as well.</p>	andersoln	03/27/2024

**Attached Documents**

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

Document Num	Description	URL
403733979	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484306">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484306</a>
710100182	March 21, 2024 ECMC Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484301">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484301</a>
710100183	March 22, 2024 ECMC Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484302">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484302</a>
710100184	March 21, 2024 ECMC Drone Imagery 2	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484303">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484303</a>
710100185	March 21, 2024 ECMC Drone Imagery	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484304">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484304</a>
710100186	March 21, 2024 Landowner Video of Spill	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484305">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6484305</a>