

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
402994119

Date Received:  
03/24/2022

FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

1 of 2 CAs from the FIR responded to on this Form

0 CA Completed  
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 46290  
Name of Operator: KP KAUFFMAN COMPANY INC  
Address: 1675 BROADWAY, STE 2800  
City: DENVER State: CO Zip: 80202

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Rickard, Jeff</u>		<u>JRickard@kpk.com</u>
<u>.KPK</u>		<u>cogcc@kpk.com</u>
<u>LLC, Marcom</u>		<u>PrimaryContractor@marcomllc.net</u>
<u>Axelson, John</u>		<u>john.axelson@state.co.us</u>
<u>Gorka, Ray</u>		<u>RGorka@kpk.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 689501343  
Inspection Date: 03/22/2022 FIR Submit Date: 03/23/2022 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: KP KAUFFMAN COMPANY INC Company Number: 46290  
Address: 1675 BROADWAY, STE 2800  
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 318931

Location Name: UPRR 42 PAN AM D-62N66W Number: 21NWNE County: \_\_\_\_\_  
Qtrqtr: NWNE Sec: 21 Twp: 2N Range: 66W Meridian: 6  
Latitude: 40.128986 Longitude: -104.781416

FACILITY - API Number: 05-123-00 Facility ID: 470886

Facility Name: UPRR 42 Pan Am D 2 battery Number: \_\_\_\_\_  
Qtrqtr: NWNE Sec: 21 Twp: 2N Range: 66W Meridian: 6  
Latitude: 40.128986 Longitude: -104.781416

CORRECTIVE ACTIONS:

1 CA# 160338

Corrective Action: Submit an Initial Form 19 Spill/Release report to document spill clean-up. Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to any additional sampling events performed on location.

Date: 03/24/2022

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: Detailed explanation is in the attached PDF document.

COGCC Decision: **Not Approved**

COGCC Representative: This Factual Resolution Request is not approved for the following reasons:

- 1) Factual Resolution Request Process is specific to eight categories. Disagreement about a spill reporting threshold is not one of those categories.
- 2) Operator indicates that 1.44bbbls infiltrated the based of unlined secondary containment, however COGCC inspectors witnessed an ongoing spill and Operator recovering free fluids at the time of the 3/21/2022 inspection, the volume of recovered fluids have not been included.
- 3) Operator indicates that 24 cubic yards were removed, this is reportable under Rule 912.b.(1).E.

COGCC Supervisor: Factual Resolution Request for a CA to submit a Form 19 is not applicable, as a result, the request is not approved.

OPERATOR COMMENT AND SUBMITTAL

Comment:

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Jeff Rickard

Signed: \_\_\_\_\_

Title: Regulatory

Date: 3/24/2022 10:45:37 AM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
402994119	FIR RESOLUTION SUBMITTED
402994122	Factual Review Response

Total Attach: 2 Files